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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 WILD HORSE EDUCATION, a non-profit
corporation; and LAURA LEIGH,
15 individually,

16 Plaintiffs,

17 v.

18 UNITED STATES DEPARTMENT OF
INTERIOR, BUREAU OF LAND
MANAGEMENT, and JON RABY, Nevada
19 State Director of the Bureau of Land
Management,

20 Defendants.

21 CASE NO. 3:23-cv-00372-LRH-CB

22 **DECLARATION OF JENNIFER RAE**
LOVKO IN SUPPORT OF PLAINTIFFS'
SECOND MOTION FOR A
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

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1 I, Jennifer Rae Lovko, declare and state as follows:

2 1. I represent Plaintiffs Wild Horse Education and Laura Leigh in this matter and
3 have been admitted pro hac vice before this court.

4 2. Attached hereto as Exhibit A is a true and correct copy of portions of the 2017
5 Environmental Analysis and Finding of No Significant Impact for the Antelope and Triple B
6 Complexes. This document was obtained on October 4, 2024 from the BLM National NEPA
7 Register at <https://eplanning.blm.gov/> and pursuant to Federal Rules of Evidence, Rule 902, is
8 self-authenticating.

9 3. Attached hereto as Exhibit B is a true and correct copy of “2018 Triple B
10 Complex Wild Horse Gather,” which was obtained on October 4, 2024 from the BLM’s website
11 at <https://www.blm.gov/programs/wild-horse-and-burro/herd-management/gathers-and-removals/nevada/2018-Triple-B-Complex-wild-horse-gather>. Pursuant to Federal Rules of
12 Evidence, Rule 902, the document is self-authenticating.

14 4. Attached hereto as Exhibit C is a true and correct copy of 2019 Triple B Complex
15 Wild Horse Gather,” which was obtained on October 8, 2024 from the BLM’s website at
16 <https://www.blm.gov/programs/wild-horse-and-burro/herd-management/gathers-and-removals/nevada/2019-triple-b-complex-wild-horse-gather>. Pursuant to Federal Rules of
17 Evidence, Rule 902, the document is self-authenticating.

19 5. Attached hereto as Exhibit D is a true and correct copy of “2020 Triple B
20 Maverick-Medicine Emergency Wild Horse Gather,” which was obtained on October 4, 2024
21 from the BLM’s website at <https://www.blm.gov/site-page/wild-horse-and-burro-herd-management-gathers-and-removals-2020-triple-b-maverick-medicine>. Pursuant to Federal Rules
22 of Evidence, Rule 902, the document is self-authenticating.

24 6. Attached hereto as Exhibit E is a true and correct copy of “2022 Triple B
25 Complex Wild Horse Gather,” which was obtained on October 4, 2024 from the BLM’s website
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1 at <https://www.blm.gov/programs/wild-horse-and-burro/herd-management/gathers-and->
2 removals/nevada-elko-do/2022-triple-b. Pursuant to Federal Rules of Evidence, Rule 902, the
3 document is self-authenticating.

4 7. Attached hereto as Exhibit F is a true and correct copy of “2024 Maverick-
5 Medicine Emergency Wild Horse Gather,” which was obtained on October 4, 2024 from the
6 BLM’s website at <https://www.blm.gov/programs/wild-horse-and-burro/herd->
7 management/gathers-and-removals/nevada-elko-do/2024-maverick. Pursuant to Federal Rules of
8 Evidence, Rule 902, the document is self-authenticating.

9 8. Attached hereto as Exhibit G is a true and correct copy of “FY2025 Tentative
10 Wild Horse and Burro Gather and Fertility Control Schedule as of September 9, 2024,” which
11 was obtained on October 4, 2024 from the BLM’s website at chrome-extension://
12 efaidnbmnnibpcajpcglclefindmkaj/<https://www.blm.gov/sites/default/files/docs/2024-09/Tentative%20FY2025%20Gather%20Schedule%20September%202024.pdf>. Pursuant to
13 Federal Rules of Evidence, Rule 902, the document is self-authenticating.
14

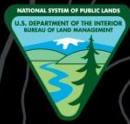
15 I declare under penalty of perjury that the foregoing is true and correct to the best of my
16 knowledge, information, and belief.

17 DATED this 10th day of October 2024 in Berkeley, Alameda County, California.

18 /s/ Jennifer Rae Lovko
19 Jennifer Rae Lovko
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EXHIBIT A

Declaration of Rae Lovko



U.S. Department of the Interior
Bureau of Land Management

Antelope and Triple B Complexes Gather Plan

Environmental Assessment

DOI-BLM-NV-E030-2017-0010-EA



1. INTRODUCTION

This Environmental Assessment (EA) has been prepared to disclose and analyze the environmental effects of the Proposed Action, which consists of gathering and removing excess wild horses from the Antelope and Triple B Complexes (hereafter referred to as the Complexes) along with fertility control management. The wild horse gather plan would allow for an initial gather and follow-up maintenance gathers to be conducted over the next 10 years from the date of the initial gather operation to achieve and maintain appropriate management levels. This EA will assist the Bureau of Land Management (BLM) Wells Field Office (WFO) and Bristlecone Field Office (BFO) in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any significant effects could result from the analyzed actions. Following the requirements of NEPA (40 CFR 1508.9 (a)), this EA describes the potential impacts of a No Action Alternative and the Proposed Action for the Antelope and Triple B Complexes. If the BLM determines that the Proposed Action for the Complexes is not expected to have significant impacts a Finding of No Significant Impact (FONSI) will be issued and a Decision Record will be prepared. If significant effects are anticipated, the BLM will prepare an Environmental Impact Statement.

This document is tiered or conforms to the following documents:

- Ely Proposed RMP (2007) (Resource Management Plan) and Final Environmental Impact Statement (*FEIS-RMP/EIS 2008*),
- Ely District Record of Decision and Approved Resource Management Plan (2008) (*Ely RMP*),
- Proposed Wells Resource Management Plan and FEIS US DOI 1983 (Wells RMP), approved July 16, 1985,
- Nevada and Northeastern California Greater Sage-Grouse Approved Resource Management Plan Amendment (BLM 2015),
- Wells RMP Wild Horse Amendment and Decision Record, approved August 1993 (US DOI 1993) (*Wells RMPWHA*).

1.1. Background

Since the passage of the Wild Free-Roaming Horses and Burros Act (WFRHBA) of 1971, BLM has refined its understanding of how to manage wild horse population levels. By law, BLM is required to control any overpopulation, by removing excess animals, once a determination has been made that excess animals are present and removal is necessary. Program goals have always been to establish and maintain a “thriving natural ecological balance” (TNEB), which requires identifying the Appropriate Management Level (AML) for individual herds. The AML is defined

as the number of wild horses that can be sustained within a designated Herd Management Area (HMA) which achieves and maintains a thriving natural ecological balance¹ in keeping with the multiple-use management concept for the area. In the past two decades, goals have also explicitly included the application of contraceptive treatments and adjusting sex ratios to achieve and maintain wild horse populations within the established AML. Both of these management actions can reduce total population growth rates in the short-term and increase gather intervals necessary to remove excess animals. Other management efforts include improving the accuracy of population inventories and collecting genetic baseline data to support genetic health assessments. Decreasing the numbers of excess wild horses removed while also reducing population growth rates and ensuring the welfare of wild horses on the range are all consistent with findings and recommendations from the National Academy of Sciences (NAS), American Horse Protection Association (AHPA), the American Association of Equine Practitioners (AAEP), Humane Society of the United States (HSUS), Government Accountability Office (GAO), Office of Inspector General (OIG) and current BLM policy. BLM's management of wild horses must also be consistent with Standards and Guidelines for Rangeland Health and for Healthy Wild Horse Populations developed by the Northeastern Great Basin Resource Advisory Council (RAC).

At the national level, annual gather removals are based on national priorities (such as risks to public safety, wild horse health and resource protection) and budget for gather operations. The national program also needs to consider the costs and budget constraints involving long-term care of excess un-adopted wild horses that have been moved to off range pastures so long as Congressional appropriations bills prohibit the euthanization or sale without limitation of excess unadopted wild horses removed from the range.

Population controls, such as the use of chemical fertility control or permanent sterilization, need to be pursued as an alternative to removal of excess horses. This would help control the population of wild horses in HMAs and bring down the number of excess wild horses in the long-term. If used as the sole approach to controlling population numbers, contraception would not allow the BLM to achieve population objectives. However, in conjunction with other techniques (e.g., removals of excess animals and adoption/sale) and through incorporation of other population control techniques (e.g., sex ratio adjustments, sterilization), it provides a valuable tool in a larger, more adaptive approach to wild horse and burro management.

¹ The Interior Board of Land Appeals (IBLA) defined the goal for managing wild horse (or burro) populations in a thriving natural ecological balance as follows: "As the court stated in *Dahl v. Clark*, *supra* at 594, the 'benchmark test' for determining the suitable number of wild horses on the public range is 'thriving ecological balance.' In the words of the conference committee which adopted this standard: 'The goal of WH&B management ***should be to maintain a thriving ecological balance between WH&B populations, wildlife, livestock and vegetation, and to protect the range from the deterioration associated with overpopulation of wild horses and burros.' " (*Animal Protection Institute of America v. Nevada BLM*, 109 IBLA 115, 1989).

The Antelope Complex includes the HMAs as listed in Table 1. The Antelope HMA is managed by the Ely District's Bristlecone FO and the Antelope Valley, Goshute, and Spruce-Pequop HMAs are managed by the Elko District's Wells FO. Refer to Figure 1 in Section 1.2.

Table 1. Antelope Complex Herd Management Areas, acres, AML, estimated population, and estimated numbers for removal.

Herd Management Area	Total Acres Private/Public land ¹	AML Range	Current Pop. Estimate (March 1, 2017)	Estimated Pop. (2017 Inventory)	Pop. Estimate with 2017 foal crop ²	Current Estimated Wild Horse Use (AUMs)	Removal Estimate to Achieve Low AML ⁵	Removal Estimate to Achieve High AML ⁵
Antelope	331,000	150-324	1,033	855	1,026	12,312	876	702
Antelope Valley	463, 540	155-259	1,320	1,517	1,705 ⁴	20,460	1,550	1,446
Goshute ³	250,800	73-124	1,015	1,191	1,429	17,148	1,356	1,305
Spruce-Pequop ³	138,000	49-82	1,170	1,269	1,523	18,276	1,474	1,441
Total	1,183,340	427-789	4,538	4,832	5,683 ³	68,196	5,256	4,894

¹ Total acres as outlined in the 1993 Wells Wild Horse RMP Amendment. See Appendix X for a discussion of HMA acre discrepancies corrected in this document.

² Estimated Population of wild horses includes the 2017 foal crop, which is based on a 20% annual growth rate. Wild horse population numbers can fluctuate among the HMAs due to seasonal movement.).

³ Total estimated population includes areas outside HMA Boundary.

⁴ Emergency gather in May 2017 removed 96 excess wild horses.

⁵ Removal estimates are based on July 2017 population estimate.

The Triple B HMA is managed by the Ely District's Bristlecone FO and the Antelope Valley and Maverick Medicine HMAs are managed by the Elko District's Wells FO. Refer to Figure 1 in Section 1.2. The Cherry Springs WHT is managed in accordance with an Interagency Agreement between the BLM and USFS.

Table 2. Triple B Complex Herd Management Areas, acres, AML, estimated population, and estimated numbers for removal.

Herd Management Area	Total Acres Private/Public land ¹	AML Range	Current Pop. Estimate (March 1, 2017)	Pop. Estimate with 2017 foal crop ²	Current Estimated Wild Horse Use (AUMs)	Removal Estimate to Achieve Low AML	Removal Estimate to Achieve High AML
Triple B	1,225,000	250-518	1,770	2,124	25,488	1,874	1,606
Maverick-Medicine	286,460	166-276	1,309	1,571	18,852	1,405	1,295

Antelope and Triple B Complexes Gather Plan EA

Herd Management Area	Total Acres Private/Public land ¹	AML Range	Current Pop. Estimate (March 1, 2017)	Pop. Estimate with 2017 foal crop ²	Current Estimated Wild Horse Use (AUMs)	Removal Estimate to Achieve Low AML	Removal Estimate to Achieve High AML
Antelope Valley West of U.S. Highway 93 ³	97,070	16-27	59	71	852	55	44
Cherry Springs WHT	23,794	40-68	63	76	912	36	13
Total	1,632,324	472-889	3,201	3,842	46,104	3,370	2,958

¹ Total acres as outlined in the 1993 Wells Wild Horse RMP Amendment. See Appendix X for a discussion of HMA acre discrepancies corrected in this document.

² Estimated Population of wild horses includes the 2017 foal crop, which is based on a 20% annual growth rate. Wild horse population numbers can fluctuate among the HMAs due to seasonal movement.).

³ Acres only represent the portion of Antelope Valley HMA west of U.S. Highway 93. Wild horses in this portion of the Antelope Valley HMA move back and forth mixing with wild horses from the Maverick-Medicine and Triple B HMAs.

The Antelope Complex has an AML range of 427-789 wild horses and the Triple B Complex has an AML range of 472-889. The combined project area (Antelope and Triple B Complexes) has an AML range of 899-1,678. Portions of the Complexes located in the Ely District were established through Final Multiple Use Decisions and reaffirmed through the 2008 Ely District Resource Management Plan (RMP) and Record of Decision (ROD). Portions of the complexes located in the Elko District were established through Final Multiple Use Decisions and the Wells Resource Management Plan Wild Horse Amendment (WRMPWHA). The Cherry Springs WHT was established on the Humboldt-Toiyabe National Forest through the Cherry Spring Wild Horse Territory Management Plan. These decisions established AMLs designed to maintain healthy wild horse populations and rangelands over the long-term based on monitoring data and in-depth analysis of habitat suitability.

The 2008 Ely RMP combined three existing HMAs (Buck and Bald, Butte, and Cherry Creek HMAs) into the Triple B HMA. The decision to combine all or portions of the three HMAs was due to the historical interchange of wild horses between the three HMAs and was also based on an in-depth analysis of habitat suitability and monitoring data as set forth in the Ely Proposed Resource Management Plan/Final Environmental Impact Statement, Table 3.8-2 and Page 4.8-2. The 2007 EIS evaluated each herd management area for five essential habitat components and herd characteristics: forage, water, cover, space, and reproductive viability. Through this analysis and the subsequent Final RMP and Record of Decision (ROD), the boundaries of the Triple B HMA were established to ensure sufficient habitat for wild horses, and an AML of 250-518 wild horses was established to achieve a thriving natural ecological balance and rangeland health.

The 2008 Ely RMP re-affirmed long-term management of wild horses within the Antelope HMA through the Ely Proposed Resource Management Plan/Final Environmental Impact Statement, Table 3.8-2 and Page 4.8-2. The 2007 EIS evaluated the herd management area for five essential

habitat components and herd characteristics: forage, water, cover, space, and reproductive viability. Through this analysis and the subsequent Final RMP and Record of Decision (ROD), the boundaries of the Antelope HMA were reaffirmed to ensure sufficient habitat for wild horses, and an AML of 150-324 wild horses was reviewed and set to achieve a thriving natural ecological balance and rangeland health.

The WRMPWHA established the baseline AMLs of 240 wild horses for the Antelope Valley HMA, 160 wild horses for the Goshute HMA, 389 wild horses for the Maverick-Medicine HMA and 82 wild horses for the Spruce-Pequop HMA. The WRMPWHA stated that adjustments would be based on monitoring and grazing allotment evaluations. The baseline AML for the Antelope Valley, Goshute and Spruce-Pequop HMAs was established at 155-259 wild horses through a combination of the 1994 Antelope Valley Final Multiple Use Decision (FMUD), the 1998 Badlands FMUD, the 1998 Spruce FMUD, the 2001 Maverick-Medicine Complex FMUD, the 2001 Sheep Allotment Complex FMUD and the 2002 Big Springs FMUD.

In the Maverick-Medicine HMA the WRMPWHA established a baseline AML of 389 wild horses, which was adjusted to 166-276 wild horses through a combination of the 1998 Spruce FMUD, the 1994 West Cherry Creek Allotment FMUD, and the 2001 Maverick-Medicine Complex FMUD. The wild horses from this HMA travel back and forth across the Elko and White Pine County line, mixing with the wild horses from the Triple B HMA. They also move back and forth mixing with wild horses from the western portion of the Antelope Valley HMA west of U.S. Highway 93. The population within this HMA can fluctuate depending on the seasonal movement of the wild horses.

The WRMPWHA established wild horse pre-livestock allowable use levels at 10% in winter use areas. (“Utilization of key forage species by wild horses in areas used in common will not exceed an average of 10 percent prior to entry by livestock”). The WRMPWHA established that utilization by all grazing animals will not exceed 55% on key species by March 31 on winter range.

The WRMPWHA stated that “the availability of forage in winter use areas is considered the most limiting factor for wild horses”. However, as wild horse numbers increase wild horses spend more and more time grazing winter use areas.

Cherry Springs WHT established an AML of 40-68 wild horses through the Cherry Springs WHT Management Plan approved in July 1993. This population range was established based on monitoring data and wild horse seasonal movement within the Cherry Springs WHT. The population within the WHT fluctuates due to seasonal movement of the wild horses between the Triple B HMA and Cherry Springs WHT.

In the 2013 National Academy of Sciences’ (NAS) report “Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward”, the science review committee reported that

annual population statistics at that time were probably substantial underestimates of the actual number of horses occupying public lands, inasmuch as most of the individual HMA population estimates are based on the assumption that all animals are detected and counted in population surveys—that is, perfect detection. A large body of scientific literature focused on inventory techniques for horses and other large mammals clearly refutes that assumption. The literature shows estimates of the proportion of animals missed on surveys ranges from 10 to 50 percent, depending on terrain ruggedness and tree cover (Caughley, 1974a; Siniff et al., 1982; Pollock and Kendall, 1987; Garrott et al. 1991a; Walter and Hone, 2003; Lubow and Ransom, 2009). The committee had little knowledge of the distribution of HMAs with respect to terrain ruggedness and tree cover, but stated that a reasonable approximation of the average proportion of horses undetected in surveys throughout western rangelands was 20% to 30%.

The Antelope Complex was most recently aerially inventoried in March 2017 using the Double Simultaneous Count method, in which observers independently observe and record groups of wild horses (Lubow and Ransom 2016). Sighting rates are estimated by comparing sighting records of the observers. Sighting probabilities for the observers are then estimated from the information collected and a population estimate is generated. The estimated population based on the 2017 Inventory was 4,832 wild horses in the Antelope Complex. At the time of implementation of the proposed gather operation, it is estimated that the population within the Antelope Complex would be approximately 5,683 wild horses (which includes the 2017 foal crop).

The Triple B Complex was most recently aerially inventoried in February 2016 and had an estimated population of 2,729 adult wild horses, which has grown to approximately 3,842 wild horses with the 2017 foal crop.

As is true for any estimates of wildlife abundance or herd size, there is always some level of uncertainty about the exact numbers of wild horses or wild burros in any HA/HMA or non-HMA area. The estimates shown here reflect the most likely number of wild horses and burros, based on the best information available to the BLM and may not account for every animal within the HA/HMA. BLM strives to conduct aerial surveys in each HMA once every three years. These surveys result in estimates that statistically account for animals that are not detected by any observer on the flights. In years without surveys, herd size estimates rely on additional information, including known numbers of animals removed and estimated annual population growth rates.

Wild horse numbers have increased an average of 20-25% annually since the HMAs were last gathered. With the projected 2017 foal crop the Antelope Complex is anticipated to be at least twelve times over low range AML and about seven times over the high range AML; while the Triple B Complex is anticipated to be about eight times over low range AML and four times over

the high range of AML². By comparison, livestock use has remained at or below active use levels. Livestock use is consistent with the grazing systems outlined in Final Multiple Use Decisions, Grazing Term Permit Renewals, Agreements, and Term Permit conditions which provide for periodic rest and deferment of key range sites.

Based upon current information, the BLM has determined that there are currently approximately 8,626 excess wild horses above low range AML within the Project Area. These excess wild horses need to be removed in order to achieve the established AMLs, restore a thriving natural ecological balance and prevent further degradation of rangeland resources. This assessment is based on factors including, but not limited to the following:

- Antelope and Triple B Complexes estimated populations exceed the established AML ranges for the project area (Tables 1 and 2).
- Heavy to severe utilization on key forage species within HMAs and severe degradation of water sources due to overpopulation of wild horses.
- Use by wild horses is exceeding the forage allocated for them by approximately 6.2 times for the Antelope Complex and approximately 3.6 times for the Triple B Complex (measured against the high end of the AML range).

² If a gather is not initiated prior to July 2018, the Antelope Complex and Triple B Complex wild horse populations would be expected to further increase by another 20% as a result of the 2018 foal crops.



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Elko District Office

3900 East Idaho Street

Elko, Nevada 89801

http://www.blm.gov/nv/st/en/fo/elko_field_office.html

DEC 21 2017

In Reply Refer To:
4170(NVE0300)

FINDING OF NO SIGNIFICANT IMPACT (FONSI) for Antelope and Triple B Complexes Gather Environmental Assessment (EA) Wells and Bristlecone Field Offices DOI-BLM-NV-E030-2017-0010-EA

Based on the interdisciplinary analysis conducted in the Antelope and Triple B Complexes Wild Horse Gather Plan Final EA, DOI-BLM-NV-E030-2017-0010-EA, dated December 20, 2017 and my consideration of the Council on Environmental Quality's criteria for Significance (40CFR 1508.27), both with regard to the context and the intensity, I have determined that the impacts associated with implementation of any of the Action Alternatives will not significantly affect the quality of the human environment. Therefore, preparation of an Environmental Impact Statement (EIS) is not required as per Section 102(2)(C) of the National Environmental Policy Act (NEPA).

Context:

The Antelope, Antelope Valley, Goshute, Maverick-Medicine, Spruce-Pequop, and Triple B Herd Management Areas (HMAs), collectively referred to as the Antelope and Triple B Complexes, are located 50 miles southeast of Elko, NV in the southeastern portion of Elko county and the northern portion of White Pine county.

The gather area is within the administrative boundaries of the Bureau of Land Management (BLM) Ely District, Bristlecone Field Office (BFO), and Elko District, Wells Field Office (WFO). The Antelope and Triple B Complexes include approximately 2,815,664 acres but the gather area consists of approximately 3,870,919 acres, which encompasses additional lands where wild horses are residing outside of the HMAs that make up the Complexes. Wild horses have moved outside of the HMAs in search of forage, water, and space due to the current over-population of wild horses in the Complexes. The estimated population of wild horses within the Antelope and Triple B Complexes is 9,525 wild horses based on population inventories conducted in February 2016 and March 2017, which is almost 11 times above the low appropriate management level (AML) of 899 wild horses.

The environmental analysis was prepared with input from the interested parties.

Intensity: There is no evidence that the severity of impacts is significant:

1. Impacts that may be both beneficial and adverse.

Beneficial and adverse effects of the Proposed Action and alternatives are described in the EA. Design features to reduce potential short-term impacts to soils, distribution of invasive non-native species, sensitive plants, migratory birds, wildlife, and cultural resources are identified.

The beneficial effects of the Proposed Action include: maintaining a thriving natural ecological balance and multiple use relationship consistent with other resource needs. Although the gather and removal of excess wild horses is expected to have short term-term impacts on individual animals, over the long-term, it is expected to benefit wild horse herd health by improving forage and habitat conditions in the Complexes and would be beneficial for rangeland resources such as vegetation communities, riparian resources and wildlife habitat.

None of the environmental impacts, both beneficial and adverse, would have a significant impact on the human environment.

2. The degree to which the proposed action affects public health and safety.

The proposed action would have minimal effects on public health or safety. The SOPs and Observation Protocols would be followed to conduct the gather and are designed to protect human health and safety, as well as the health and safety of the wild horses. The SOPs and Protocols can be found in the Antelope and Triple B Complexes Wild Horse Gather Plan Final EA Appendices 1-3.

3. Unique characteristics of the geographic area such as proximity of historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

There are no park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas within the gather area. Direct impacts to cultural resources are not anticipated because gather sites and temporary holding facilities would be placed in previously disturbed areas or inventoried for cultural resources prior to construction. Wild horse gather activities could be conducted within Wilderness Study Areas as outlined in the EA. The Proposed Action would not impact resources and/or special designations identified above. Achievement and maintenance of the established AML over the next ten years through the phased gathers and implementation of population controls would protect these landscapes from adverse impacts caused by the current over-population of wild horses.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The effects that would occur from implementation of the gather are well known and understood. This is demonstrated through the effects analysis in the EA. Some members of the public advocate that no wild horses should be removed from any public lands and urge removal of livestock or letting “nature take its course”. However, the effects of wild horse gathers on the

quality of the human environment are well documented through the many years of management of wild horses through gathers and other population controls (ZonaStat-H, Porcine Zona Pellucida PZP, PZP-22, GonaCon or gelding), and are not highly controversial. No unresolved issues concerning the impacts to resources or the human environment were raised following public notification of the proposed gather.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The Proposed Action has no known effects on the human environment which are considered highly uncertain or involve unique or unknown risks. This is demonstrated through the effects analysis in the EA.

Helicopter drive trapping as well as bait/water and horseback drive trapping are not new methods of capturing wild horses and have been successfully used for decades. There are no uncertain or unknown risks to the human environment associated with these capture methods. PZP and other fertility or reproductive control treatments (such as gelding) (see question 4 above) are not uncertain nor do they pose unknown risks to the human environment associated with such treatments.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

Future projects occurring within the gather area would be evaluated with the appropriate level of NEPA documentation. The Proposed Action does not set a precedent for future actions.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The Proposed Action is not related to other actions within the project area that would result in cumulatively significant impacts. Proper environmental analysis would be completed for all future actions.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.

The Proposed Action would not affect significant scientific, cultural, or historical resources. A cultural resource inventory would be completed prior to gather site and corral construction. Temporary gather sites and holding facilities would be cleared to determine the presence of sites that are unclassified, eligible, or potentially eligible for the National Register of Historic Places. Archaeological site clearances and avoidance measures would ensure that loss or destruction of significant scientific, cultural, or historical resources does not occur.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

The Proposed Action and Alternatives B and C would not have any negative impact to threatened or endangered species or habitat identified to be critical under the Endangered Species Act. The EA has identified two endangered species located on private lands (Independence Valley Speckled Dace and Clover Valley Speckled Dace) within the project area. The endangered species are expected to meet life cycle requirements. Therefore, it has been determined the proposed activities would not adversely affect the species or their critical habitat.

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The Proposed Action, Alternative A is in conformance with Federal, State, or local laws or requirements imposed for the protection of the environment.

The Proposed Action, Alternative A is in conformance with all applicable regulations under 43 CFR (Code of Federal Regulations). The Proposed Action is in conformance with the Migratory Bird Treaty Act and Endangered Species Act.

All practicable means to avoid or minimize environmental harm and unnecessary or undue degradation of the public land are inherent to the Proposed Action, Alternative A.

Jill C. Silvey *12/20/2017*

Jill C. Silvey Date
Manager
Elko District Office



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Elko District Office
3900 East Idaho Street
Elko, Nevada 89801

http://www.blm.gov/nv/st/en/fo/elko_field_office.html

DEC 21 2017

In Reply Refer To:

DECISION RECORD

Antelope and Triple B Complexes Wild Horse Gather Plan Environmental Assessment DOI-BLM-NV-E030-2017-0010-EA

The BLM has prepared an environmental assessment (EA) to analyze the environmental impacts associated with the proposed gather, removal, and fertility controls. Refer to **DOI-BLM-NV-E030-2017-0010-EA**. The Antelope, Antelope Valley, Goshute, Maverick-Medicine, Spruce-Pequop, and Triple B Herd Management Areas (HMAs), collectively referred to as the Antelope and Triple B Complexes, are located 50 miles southeast of Elko, NV in the southeastern portion of Elko county and the northern portion of White Pine county.

The gather area is within the administrative boundaries of the Bureau of Land Management (BLM) Ely District, Bristlecone Field Office (BFO), and Elko District, Wells Field Office (WFO). The Antelope and Triple B Complexes include approximately 2,815,664 acres but the gather area consists of approximately 3,870,919 acres, which encompasses additional lands where wild horses are residing outside of the HMAs that make up the Complexes. Wild horses have moved outside of the HMAs in search of forage, water, and space due to the current over-population of wild horses in the Complexes. The estimated population of wild horses within the Antelope and Triple B Complexes is 9,525 wild horses based on population inventories conducted in February 2016 and March 2017, which is almost 11 times above the low appropriate management level (AML) of 899 wild horses.

The Wells and Bristlecone Field Offices, Bureau of Land Management (BLM) are proposing to implement Alternative A (Proposed Action). Alternative A consists of a 10-year gather plan and population control measures resulting in the removal of excess wild horses to achieve and maintain the population at AML. Under Alternative A, BLM would gather and remove approximately 9,053 excess wild horses within the Complexes to achieve and maintain AML and to implement population control measures to gathered and released horses over a period of ten years from the initial gather. This would allow BLM to achieve management goals and objectives of attaining AML, reducing population growth rates, and attaining a thriving natural ecological balance (TNEB) on the range as identified within the Wild Free-Roaming Horse and Burro Act of 1971 (WFRHBA). Funding limitations and competing National priorities may affect the timing of gather operations and implementation of population control components of the Proposed Action.

The Elko and Ely Districts would prioritize subsequent gathers and removals of excess wild horses as follows, from areas where public health and safety issues have been identified, private land and non-HMA, areas where resource degradation has been identified and then within HMAs to reach and maintain AML.

The management objective for the Antelope and Triple B Complex would be to gather and remove excess wild horses within the Complexes to achieve and maintain AML. Additionally, BLM would implement growth suppression measures to include:

- Administration of population control measures (i.e. PZP, PZP 22, GonaCon or newly developed formulations) to released horses.
- Adjustment of sex ratios to achieve a 60 % male ratio within the core breeding population of 899 wild horses.
- Some gelded horses that would otherwise be excess animals permanently removed from the range and sent to holding facilities for adoption/sales or long-term holding, may be returned to the range and managed as a non-breeding population of geldings so long as the geldings do not result in the population exceeding mid-range AML.
- To help reduce population growth rates, the Complexes would be managed to achieve a 60% male 40% female sex ratio; and all mares released back to the Complexes would be treated with fertility control (i.e. PZP, GonaCon or newly developed formulations). The combination of these actions would lower the population growth rate within the Complexes.

This component of the Proposed Action, would reduce the total number of wild horses that would otherwise be permanently removed from the range. This would allow for management of a larger total wild horse population within the Complexes while still managing population growth and achieving a thriving natural ecological balance. Primary gather methods would include helicopter, bait, and water trapping.

DECISION

It is my decision to implement Alternative A as described in the Final Environmental Assessment for the Antelope and Triple B Complexes (**DOI-BLM-NV-E030-2017-0010-EA**).

My final decision is to gather and remove excess wild horses over a ten-year period from the initial gather within and outside the Antelope and Triple B Complexes, and to reduce the wild horse population growth rates to achieve and maintain established AML ranges. This action is needed to prevent undue or unnecessary degradation of public lands associated with excess wild horses, and to restore a thriving natural ecological balance and multiple-use relationship on public lands, consistent with the provisions of Section 1333(b) or the 1971 Wild Free-Roaming Horses and Burros Act (WFRHBA)

Pursuant to 43 C.F.R. § 4770.3(c), this decision is effective immediately.

RATIONALE

Upon analyzing the impacts of Alternative A, and following issuance of the EA for public review, I have determined that Alternative A will not have a significant impact to the human environment, and that an Environmental Impact Statement is not required. Refer to attached Finding of No Significant Impact.

Removal of excess wild horses from the gather area is necessary to achieve a TNEB between wild horse populations, wildlife, livestock, vegetation, and the available water as mandated under Section 3(b) (2) of the Wild Free-Roaming Horses and Burros Act of 1971 (WFRHBA) and consistent with section 302(b) of the Federal Land Policy and Management Act (FLPMA) of 1976. A gather of wild horses from the area is also necessary to prevent continued degradation of rangeland resources, and the unnecessary death or suffering of individual wild horses that are being currently impacted by a lack of water and forage. The BLM is required to manage multiple uses to avoid continued degradation of the rangelands, and reduce the potential for catastrophic loss of animals.

Based on available data showing heavy and severe use of vegetative resources in many areas by the current overpopulation of wild horses, leaving excess wild horses on the range under the No Action Alternative would lead to severe degradation of the range, damage to riparian resources including the habitat necessary for the recovery of sage grouse and their habitat, and potential catastrophic die-off of wild horses as the population continues to grow in excess of available habitat resources. The No Action Alternative would also result in the continued movement of wild horses to areas outside the designated HMAs, potentially leading to severe resource degradation and competition with grazing and wildlife.

The gather will:

- Promote vegetative health by preventing over utilization (i.e., excessive use) by wild horses, including during critical growth periods for perennial grasses in the upland, wetland and stream bank riparian habitats associated with the Complexes;
- Decrease resource competition for space, forage and water among wild horses, wildlife, and livestock;
- Although impacts would still occur through wild horse and livestock grazing, removal of excess wild horses will contribute to improved vegetation density, increased plant vigor, seed production, seedling establishment, and forage production over current conditions by reducing grazing pressures caused by the wild horse overpopulation;
- Slow wild horse population growth rates through implementation of the phased-in gather and fertility control treatment and sex ratio modification which could extend the amount of time between gathers to remove excess horses as required under the WFRHBA; and
- Preserve the health and wellbeing of those animals removed from the range as well as the wild horses that will remain within the Complexes.

Fertility control treatments and modification of sex ratios of released wild horses will slow population growth, reduce the number of wild horses needing to be removed through future gathers, decrease the number of excess wild horses placed in short-term or off-range holding facilities or offered for adoption or sale over the next ten years, and potentially increase the time period before removal of additional excess wild horses is necessary. The removal of excess wild horses to achieve AML and the maintenance removal of smaller numbers of adoptable wild horses from the gather area in follow-up gathers will ease pressure on short-term and off-range facilities that may have insufficient capacity to handle all of the excess wild horses if removed in a single gather, and will also provide a greater likelihood that a sufficient gather efficiency can be achieved to apply fertility controls to a larger segment of the wild horse population that remains post-gather.

Managing wild horses at the established AML will maintain genetic health and long-term viability of the herds. Reduced growth rates and lower population sizes will also allow for improvements to range condition, with long-term benefits to wild horse habitat quality, and will allow BLM to manage wild horses at a level that will ensure a TNEB.

The action is in compliance with the WFRHBA by achieving the established AML, restoring a TNEB and preventing degradation of rangeland resources resulting from an overpopulation of wild horses. This assessment is based on factors including, but not limited to the following rationale:

- Based on the population inventories completed February 2016 and March 2017, the population of wild horses in the Complexes is approximately 9,525 animals.
- Once wild horse core breeding populations are at low AML and are being managed in conjunction with a gelding component around the mid AML range, BLM will be able to collect the resource monitoring data necessary to determine if wild horses are causing impacts that lead to non-attainment of the Northeastern Great Basin Resource Advisory Council (RAC) Standards and Guidelines (February 12, 1997) for Rangeland Health and Healthy Wild Horse and Burro Populations in the allotments within the HMAs. Adjustments could be made upward or downward based on monitoring data collected once AML is being achieved and maintained. Additionally, through Standards and Guidelines Assessments for grazing allotments, livestock carrying capacity could be adjusted as well. Consideration would be given to adjustments to AML and livestock carrying capacity that are needed to maintain or improve rangeland;
- Excess wild horses have moved onto private and public lands that fall outside of designated HMA boundaries in search of additional habitat outside the Complexes, due to the significant overpopulation within the Complexes. Regulations at 43 C.F.R. § 4710.4 require BLM to manage wild horses within their HMAs and to remove wild horses that take up residence outside of HMA boundaries.
- Water is a limited resource within the Complexes and becomes a limiting factor when wild horse populations exceed high range AML.

The following constitutes the rationale for making this decision effective upon issuance:

1. Damage to Rangeland and Riparian Resources

Wild horse population and resource monitoring data shows that current wild horse populations are exceeding the range's ability to sustain them and are exceeding the levels at which healthy rangelands can be maintained. Excess wild horses are now residing outside the Complexes as more wild horses compete for limited forage, space and water resources. Resource damage is occurring and native vegetative communities in parts of the Complexes have already crossed critical ecological thresholds that could prevent or significantly slow their natural recovery. This resource degradation and potential for irreversible ecological damage will continue without immediate action to remove excess wild horses and to bring the wild horse population back to AML. Riparian areas are also receiving heavy utilization and trampling impacts, and limited waters are being adversely impacted by concentrations of wild horses. Wildlife is also being adversely impacted by degradation of rangeland resources and are unable to access water in some areas due to the extended presence of wild horses at water sources.

In accordance with 43 C.F.R. § 4720.1, upon examination of current information, I have determined that an excess of wild horses exists within the project area boundaries, and that the excess animals need to be removed to achieve AML and achieve a thriving natural ecological balance.

PUBLIC INVOLVEMENT

On-going consultation with Resource Advisory Councils (RACs), the Nevada Department of Wildlife, U.S. Fish and Wildlife Service, livestock operators and others, underscores the need for BLM to manage wild horse populations within AML.

Public hearings are held annually on a state-wide basis regarding the use of motorized vehicles in the management of wild horses (or burros) (inventory, gather operations, and transport). During these meetings, the public is given the opportunity to present new information and to voice any concerns or opinions regarding the use of motorized vehicles in the management of wild horses and burros. The Ely District Office held the 2017 Nevada state-wide hearing on June 27, 2017.

The BLM has been gathering excess wild horses and burros from public lands since 1975, and has been using helicopters for such gathers since the late 1970's. Refer to Appendices I-III of the Antelope and Triple B Complexes Wild Horse Gather Environmental Assessment for information about methods that are utilized to reduce injury or stress to wild horses and burros during gathers. Since 2004, BLM Nevada has gathered over 40,000 excess animals. Of these, gather related mortality has averaged 0.5%, which is very low when handling wild animals. Another 0.6% of the animals captured were humanely euthanized due to pre-existing conditions and in accordance with BLM policy. This data confirms that appropriate use of helicopters and motorized vehicles are a safe, humane, effective and practical means for gathering and removing excess wild horses and burros from the range. BLM policy prohibits the gathering of wild horses with a helicopter (unless under emergency conditions) during the period of March 1 to June 30

which includes and covers the six weeks that precede and follow the peak of foaling (mid-April to mid-May).

The Preliminary Antelope and Triple B Complexes Gather Plan EA #DOI-BLM-NV-E030-2017-0010-EA was made available to interested individuals, agencies and groups for a public review and comment period that opened on July 21, 2017, and closed August 21, 2017 at 4:30 pm PDT. The EA and associated documents were also available from the BLM's NEPA Register, and a link to the NEPA Register was provided from the Elko District's NEPA website.

The BLM received over 4,940 comment submissions during the public comment period; the majority of those submissions (more than 4,780 or 97%) were form letters. Form letters are generated from a singular website from a non-governmental organization, such as an animal advocacy group. Comments identified on the form letters were considered along with the rest of the comments received, but as one collective comment letter. Form letters are not counted as separate comments due to their duplicative nature. However, where individuals added their own comments to the form, the personalized comments were considered as separately submitted comments. All comments received prior to the end of the public comment period were reviewed and considered. Substantive comments were used in finalizing the EA as appropriate. Letters and e-mails were received both in support of and in opposition to the gather.

Although the BLM's review of public comments did not indicate that substantive changes to the conclusions presented in the preliminary EA were warranted, they did lead to changes throughout the document to better explain and clarify BLM's analysis in response to comments, which resulted in a more comprehensive and complete document. In finalizing the EA, the following information was updated:

- The March 2017 population inventory results were incorporated into the final EA. These results furthered the BLM's understanding of the current population conditions within the Complexes. With the updated survey numbers, wild horse AUM calculations were also updated to reflect the current wild horse population numbers. This data was incorporated into Table 1. Antelope Complex Herd Management Area, Acres, AML, Estimated Population, Estimated Wild Horse Use AUMs and Estimated Numbers for Removal.
- Appendix IX was added to describe and discuss the corrected acres for some of the HMAs in the Wells Field Office.
- Clarification in Chapter 2.1 Actions Common to Alternatives A-C of the BLM gather timing requirements, avoiding the six weeks that precede and follow the peak of foaling (mid-April to mid-May).
- Clarification of the gelding component in Alternative A, to explain that the core breeding population will be brought to low AML. Some gelded horses that would otherwise be excess animals permanently removed from the range and sent to holding facilities for adoption/sales or long-term holding, may be returned to the range and managed as a non-breeding population of geldings so long as the geldings do not result in the population exceeding mid-range AML. This clarification was necessary due to lack of clarity and

discrepancies in how the gelding component was described in Chapters 2 and 3 of the preliminary EA.

Public Involvement information Appendix VIII was updated.

The final Environmental Assessment/ Gather Plan for the Antelope and Triple B Complexes is available on the National NEPA Register web page at: <http://bit.ly/2vfWTZJ>
Or by contacting the Elko or Ely Office's.

AUTHORITY

The authority for this decision is contained in Section 3(b)(2) of the 1971 Free-Roaming Wild Horses and Burros Act, Section 302(b) of the Federal Land Policy and Management Act (FLPMA) of 1976, and Code of Federal Regulations (C.F.R.) at 43 C.F.R. Part 4700.

43 C.F.R. § 4700.0-6 Policy

- (a) Wild horse and burros shall be managed as self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat;
- (b) Wild horses and burros shall be considered comparably with other resource values in the formulation of land use plans;
- (c) Management activities affecting wild horses and burros shall be undertaken with the goal of maintaining free-roaming behavior;
- (d) In administering these regulations, the authorized officer shall consult with Federal and State wildlife agencies and all other affected interests, to involve them in planning for and management of wild horses and burros on the public lands.

43 C.F.R. § 4710.4 Constraints on Management

Management of wild horses and burros shall be undertaken with the objective of limiting the animals' distribution to herd areas. Management shall be at the minimum level necessary to attain the objectives identified in approved land use plans and herd management area plans.

43 C.F.R. § 4720.1 Removal of excess animals from public lands

Upon examination of current information and a determination by the authorized officer that an excess of wild horses or burros exists, the authorized officer shall remove the excess animal immediately in the following order.

- (a) Old, sick, or lame animals shall be destroyed in accordance with subpart 4730 of this title;
- (b) Additional excess animals for which an adoption demand by qualified individuals exists shall be humanely gathered and made available for private maintenance in accordance with subpart 4750 of this title; and
- (c) Remaining excess animals for which no adoption demand by qualified individuals exists shall be destroyed in accordance with subpart 4730 of this part.

43 C.F.R. § 4740.1 Use of Motor Vehicles or Air-Craft

- (a) Motor vehicles and aircraft may be used by the authorized officer in all phases of the administration of the Act, except that no motor vehicle or aircraft, other than helicopters, shall be used for the purpose of herding or chasing wild horses or burros for capture or destruction. All such use shall be conducted in a humane manner.
- (b) Before using helicopters or motor vehicles in the management of wild horses or burros, the authorized officer shall conduct a public hearing in the area where such use is to be made.

43 C.F.R. § 4770.3 Administrative Remedies

- (a) Any person who is adversely affected by a decision of the authorized officer in the administration of these regulations may file an appeal. Appeals and petitions for stay of a decision of the authorized officer must be filed within 30 days of receipt of the decision in accordance with 43 CFR, part 4.
- (c) Notwithstanding the provisions of paragraph (a) of § 4.21 of this title, the authorized officer may provide that decisions to remove wild horses or burros from public or private lands in situations where removal is required by applicable law or is necessary to preserve or maintain a thriving natural ecological balance and multiple use relationship shall be effective upon issuance or on a date established in the decision.

APPEAL PROVISIONS

Within 30 days of receipt of this wild horse decision, you have the right to appeal to the Board of Land Appeals, Office of the Secretary, in accordance with regulations at 43 C.F.R. § 4.4. If an appeal is taken, you must follow the procedures outlined in the enclosed Form 1842-1, "Information on Taking Appeals to the Board of Land Appeals." Please also provide this office with a copy of your Statement of Reasons. An appeal should be in writing and specify the reasons, clearly and concisely, as to why you think the decision is in error.

In addition, within 30 days of receipt of this decision you have a right to file a petition for a stay (suspension) of the decision together with your appeal in accordance with the regulations at 43 C.F.R. § 4.21. The petition must be served upon the same parties identified in items 2, 3, and 4 of the enclosed Form 1842-1. The appellant has the burden of proof to demonstrate that a stay should be granted.

A petition for a stay of decision pending appeal shall show sufficient justification based on the following standards:

- 1) The relative harm to the parties if the stay is granted or denied;
- 2) The likelihood of the appellant's success of the merits;
- 3) The likelihood of immediate and irreparable harm if the stay is not granted; and
- 4) Whether the public interest favors granting the stay.

At the conclusion of any document that a party must serve, the party or its representative must sign a written statement certifying that service has been or will be made in accordance with the applicable rules and specifying the date and manner of such service (43 C.F.R. § 4.401 (c) (2)).

The Office of Hearings and Appeals regulations do not provide for electronic filing of appeals, therefore they will not be accepted.

APPROVAL

The gather is approved to begin at any time after January 1, 2018, as soon as funding and national priorities permit. This decision is effective upon issuance in accordance with Title 43 of the Code of Federal Regulations (CFR) at 4770.3© because removal of excess wild horses is necessary to protect animal health and prevent further deterioration of rangeland resources. It may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with 43 C.F.R. Part 4, Subpart B (Attachment 1 and enclosed Form 1842-1).

Jill C. Silvey
Jill C. Silvey
Manager
Elko District Office

12/20/2017
Date

EXHIBIT B
Declaration of Rae Lovko



Home / Programs / Wild Horse and Burro / Herd Management / Gathers and Fertility Control Operations / Nevada / Program: Wild Horse and Burro: Herd Management: Gathers and Removals: Nevada: Triple B Complex Wild Horse Gather

2018 Triple B Complex Wild Horse Gather

The Triple B Complex gather has concluded with 1,389 wild horses gathered. All the horses identified for removal will be transported to the Palomino Valley Wild Horses and Burro Adoption Center in Reno, Nevada where they will be checked by a veterinarian and readied for the BLM's wild horse and burro adoption program. For information on how to adopt a wild horse, visit www.blm.gov/whb.

You can also go to the [BLM's Facilities and Internet Adoption page](#)- be sure to check this one out!

Purpose of Gather:

The purpose of the operation is to prevent undue or unnecessary degradation of the public lands associated with excess wild horses, and to restore a thriving natural ecological balance and multiple-use relationship on public lands, consistent with the provisions of Section 1333(b) of the 1971 Wild Free-Roaming Horses and Burros Act. The BLM strives to be a good neighbor in the communities we serve, ensuring public safety is not at risk due to the overpopulation of wild horses and providing opportunities for economic growth with space for traditional uses.

Details of Gather:

Originally, the BLM had planned to gather 1,500 wild horses and remove approximately 1,000 excess horses. Due to a larger number of animals located outside the Complex, and on private lands, public safety concerns, a higher rate of horses in poor body condition than anticipated, and concerns that the abnormally dry conditions could lead to an emergency situation this summer, BLM will gather fewer total animals, but will remove an additional 300 horses from the range. Approximately a total of 1400 wild horses would be gathered, of which 1300 excess horses would be removed. A total of

28 mares have been treated with PZP and released. There will be no further PZP treatments for the remainder of this gather. The gather operation, is still expected to last approximately a month and is being conducted by the BLM Ely and Elko District Offices. Approximately 2,466 wild horses will remain in the complex once the gather is completed.

Public Observation:

Members of the public are welcome to view the daily gather operations, provided that doing so does not jeopardize the safety of the animals, staff and observers, or disrupt gather operations. The BLM will escort the public to gather observation sites located on public lands. The BLM anticipates that viewing opportunities will begin on January 23, 2018, weather and logistics permitting. Those wanting to view gather operations must notify Public Affairs Specialist, Greg Deimel at (775) 388-7078 prior to the desired viewing date to be added to the attendee list and receive specific instructions on meeting locations and times.

Participants must provide their own transportation. The BLM recommends footwear and clothing suitable for harsh field conditions and a four-wheel drive, high clearance vehicle.

Background:

The Triple B Complex is located in both the BLM Ely and Elko Districts and consists of the [Triple B HMA](#) (Ely), [Maverick Medicine HMA](#) (Elko), [Antelope Valley HMA](#) west of Hwy 93 (Elko), and Cherry Springs Wild Horse Territory (Elko). The gather may also take place in areas outside of those HMAs where wild horses have moved in search of food and water and are creating a public safety hazard by traveling regularly across Jiggs Road.

The current population estimate for the Triple B Complex is approximately 3,842 wild horses. The cumulative Appropriate Management Level for all the Herd Management Areas within the targeted gather area is 472 – 884 wild horses. AML is the level at which wild horse populations are consistent with the land's capacity to support them and other mandated uses of those lands, including protecting ecological processes and habitat for wildlife and livestock.

The decision record and determination of National Environmental Policy Act adequacy can be accessed at the [national NEPA register](#). For more information on the Wild Horse and Burro Program, call 1-866-468-7826 or email wildhorse@blm.gov.



Gather Reports

February 23, 2018

Summary: Shipping operations for the Triple-B Complex Gather have concluded with a total of 1,294 wild horses shipped.

Animals gathered: 0

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 71 (71 Studs, 0 Mares, and 0 Foals)

Total Deaths Today: 2

Acute: 0

Chronic/Pre-existing: 2

* 3-year-old bay stud with a BCS 3, was humanely euthanized in accordance with IM 2015-070 due to serious physical defect (club foot).

* 19+ year-old bay stud with a BCS 3, was humanely euthanized in accordance with IM 2015-070 due a hopeless prognosis for recover due to preexisting condition (blindness).

February 22, 2018

Summary: Shipping operations for the Triple-B Complex Gather continued smoothly today. Horses will continue to be shipped from holding until all horses have been shipped.

Animals gathered: 0

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 85 (26 Studs, 39 Mares, and 20 Foals)

Total Deaths Today: 0

Acute: 0

Chronic/Pre-existing: 0

February 21, 2018

Summary: The Triple-B Complex concluded today with a smooth operation.

Horses will be shipped from holding until all horses have been shipped.

Animals gathered: 80 (27 Studs, 26 Mares, and 17 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 1

Acute: 0

Chronic/Pre-existing: 1

*3-year- old cremello Stud with a BCS 3, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to pre-existing condition (blindness)

February 20, 2018

Summary: Today's gather operation went smoothly with over 100 horses gathered. Horses gathered today were in good condition. Gather operations continue tomorrow.

Animals gathered: 121 (38 Studs, 58 Mares, and 25 Foals)

Mares treated with fertility control: 0

Animals released: 6 (3 Mares, 3 Foals)

Animals shipped: 83 (26 Studs, 39 Mares, and 18 Foals)

Total Deaths Today: 1

Acute: 0

Chronic/Pre-existing: 1

*20 + -year- old Bay Stud with a BCS of 2 had serious physical defect (severe tooth loss) was humanely euthanized in accordance with IM 2015-070.

February 19, 2018

Summary: Today's gather went very smoothly even though it was around 20 degrees during the day. One hundred and seven horses were gathered. Expect more cold weather tomorrow.

Animals gathered: 107 (46 Studs, 43 Mares, and 18 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 1

Acute: 0

Chronic/Pre-existing: 1

*9 year old bay stud BCS 4 was humanely euthanized in accordance with IM 2015-070 due a hopeless prognosis for recover due to preexisting condition (blindness).

February 18, 2018

Summary: There was no flying today because of weather. Continuing to watch the winter storm.

Animals gathered: 0

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 0

Acute:

Chronic/Pre-existing: 0

February 17, 2018

Summary: Gather operations continued today with 99 horses gathered. There is an approaching storm front, that we will be monitoring that may affect gather operations Sunday and maybe Monday.

Animals gathered: 99 (39 Studs, 39 Mares, and 21 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 41 (13 Studs, 13 Mares, and 15 Foals)

Total Deaths Today: 6

Acute:

Chronic/Pre-existing: 6

*12 year old sorrel mare, BCS 1 very emaciated, and heavily infested with parasites was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

*5 year old bay mare, BCS 1 very emaciated, and heavily infested with parasites was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

*6 year old sorrel mare, BCS 1 very emaciated, and heavily infested with parasites was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

*3 year old black mare, BCS 1 very emaciated, and heavily infested with parasites was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

*10 year old bay mare, BCS 1 very emaciated, and heavily infested with parasites was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

*5 year old black mare, BCS 1 very emaciated, and heavily infested with parasites was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

February 16, 2018

Summary: Today was a good day of gather operations with 62 horses gathered. The gather site will be at a new location for tomorrow. We do have incoming weather for Sunday and possibly Monday

Animals gathered: 62 (19 Studs, 28 Mares, and 15 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 68 (28 Studs, 30 Mares, and 10 Foals)

Total Deaths Today: 2

Acute:

Chronic/Pre-existing: 2

*3 year old sorrel mare, BCS 1 very emaciated, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

*9 year old sorrel mare, BCS 1 very emaciated, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

February 15, 2018

Summary: Gather activity went well again today. The team is keeping an eye on the upcoming weather patterns in anticipation of some snow.

Animals gathered: 50 (18 Studs, 21 Mares, and 10 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 43 (13 Studs, 16 Mares, and 14 Foals)

Total Deaths Today: 2

Acute:

Chronic/Pre-existing: 2

*25+ year old bay mare, BCS 1 very emaciated, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

*8 year old bay stud, BCS 2, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to pre-existing condition (broken back).

February 14, 2018

Summary: Gather operations went smoothly today as another round of winter weather approaches this evening and tomorrow. Today 52 horses were gathered.

Animals gathered: 52 (19 Studs, 19 Mares, and 14 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 41 (13 Studs, 16 Mares, and 12 Foals)

Total Deaths Today: 0

Acute:

Chronic/Pre-existing: 0

February 13, 2018

Summary: Gather operations continued today under improving weather and 55 horses were gathered. Locations were looked at in the afternoon for favorable areas to relocate the gather trap site.

Animals gathered: 55 (19 Studs, 24 Mares, and 12 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 2

Acute:

Chronic/Pre-existing: 2

*8 year old bay stud, BCS 2, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to preexisting condition (broken leg).

*6 year old sorrel mare, BCS 1.5 very emaciated, watched for 2 days and continued to decline, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for improvement.

February 12, 2018

Summary: Gather operations continued in the Maverick Medicine area with colder temperatures and wind for approximately a half of a day. It was a smooth day with 59 horses gathered.

Animals gathered: 59 (17 Studs, 30 Mares, and 12 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 1

Acute:

Chronic/Pre-existing: 1

*4 year old bay mare was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to pre-existing condition (broken back).

February 11, 2018

Summary: A very successful day of gather operations today as 98 horses were gathered while a little bit of weather is approaching overnight tonight.

Animals gathered: 98 (41 Studs, 32 Mares, and 22 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 2

Acute:

Chronic/Pre-existing: 2

*20+ year-old bay stud was humanely euthanized in accordance with IM 2015-070 due a hopeless prognosis for recovery due to pre-existing condition (blindness).

*4 year old buckskin mare, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to a pre-existing condition (broken front leg).

February 10, 2018

Summary: Operations for the Triple-B Wild Horse Gather continue to go smoothly with good weather conditions.

Animals gathered: 87 (43 Studs, 31 Mares, and 13 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 1

Acute:

Chronic/Pre-existing: 1

*10 year sorrel mare, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to a pre-existing condition (broken hind leg)

February 9, 2018

Summary: The gather team moved the holding area today. There were no wild horses gathered during today's operation.

Animals gathered: 0

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today: 0

Acute:

Chronic/Pre-existing:

February 8, 2018

Summary: The trap site location was moved on February 8, 2018 and because of this, there were no horses gathered. Gather operations are expected to pick back up tomorrow.

Animals gathered: 0

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 30 (7 Studs, 18 Mares, and 5 Foals)

Total Deaths Today: 0

Acute:

Chronic/Pre-existing:

February 7, 2018

Summary: Gather operations for Feb. 7 included releasing back on the range studs and treated mares and a small gather at a new site. Today the gather and temporary holding sites are relocating to new sites.

Animals gathered: 30 (7 Studs, 18 Mares, and 5 Foals)

Mares treated with fertility control: 28

Animals released: 29 mares 27 studs

Animals shipped: 104 (36 Studs, 45 Mares, and 23 Foals)

Total Deaths Today: 1

Acute: 1

Chronic/Pre-existing:

*20+ bay mare, BCS 2, diagnosed with colic was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to pre-existing condition.

February 5, 2018

Summary: The Triple B Complex gather conducted gather operations at two sites on February 5. The morning gather site was the same location as February 4 and the afternoon location was in a different spot and will be sued for February 6 as well. We are approaching release dates for this first gather area. Gather operations continue to run smoothly.

Animals gathered: 117 (63 Studs, 30 Mares, and 24 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 43 (12 Studs, 21 Mares, and 10 Foals)

Total Deaths Today:

Acute:

Chronic/Pre-existing: 3

*1-year- old cremello mare with a BCS 2, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to pre-existing condition (blindness).

*2-year- old cremello stud, with a BCS 2, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to pre-existing condition (blindness).

*16-year- old cremello stud, with a BCS 1.5, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to preexisting condition (blindness).

February 4, 2018

Summary: Gather operations on February 4, 2018 gathered 59 horses under great conditions.

Animals gathered: 59 (25 Studs, 23 Mares, and 11 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 38 (14 Studs, 14 Mares, and 10 Foals)

Total Deaths Today:

Acute:

Chronic/Pre-existing: 1

*3-year-old palomino mare, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to pre-existing condition (blindness).

February 3, 2018

Summary: Gather activities today lasted for a half of a day. Thirty six horses were gathered today. The trap site moved this afternoon and will be at new location for tomorrow.

Animals gathered: 36 (14 Studs, 16 Mares, and 6 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 128 (52 Studs, 39 Mares, and 37 Foals)

Total Deaths Today:

Acute: 1

Chronic/Pre-existing: 0

*8 year old sorrel stud, broke neck while loading horses to ship.

February 2, 2018

Summary: The BLM Nevada Triple B Complex Gather continued today with a total of 115 horses gathered today. The gather and trap site has moved for tomorrow. The gather continues to operate with good weather.

Animals gathered: 115 (47 Studs, 43 Mares, and 25 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today:

Acute: 0

Chronic/Pre-existing: 2

*9 year old sorrel stud, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery due to a pre-existing condition (broken hind leg which had healed incorrectly).

*25 year old sorrel mare, with a BCS of 1, was humanely euthanized in accordance with IM 2015-070 due to a serious physical defect (severe tooth loss).

February 1, 2018

Summary: Day two of the Triple B Complex Gather went smoothly under perfect weather conditions. This morning 31 horses were shipped to the Palomino Valley Wild Horses and Burro Adoption Center in Reno, Nevada. The Gather Site Trap moved this afternoon and horses will be gathered at the new site beginning February 2.

Animals gathered: 47 (14 Studs, 22 Mares, and 11 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 31 (7 Studs, 13 Mares, and 11 Foals)

Total Deaths Today:

Acute: 0

Chronic/Pre-existing: 0

January 31, 2018

Summary: The first day of gather operations went smoothly. The operations group gathered wild horses for roughly half the day with no major incidents. The weather was great and tomorrow's operations are expected to go as scheduled.

Animals gathered: 42 (16 Studs, 15 Mares, and 11 Foals)

Mares treated with fertility control: 0

Animals released: 0

Animals shipped: 0

Total Deaths Today:

Acute: 0

Chronic/Pre-existing: 1

**9 year old sorrel stud, with a BCS of 1.5, was humanely euthanized in accordance with IM 2015-070 due to a hopeless prognosis for recovery as well as pre-existing conditions (facial lacerations).

- [Bureau of Land Management concludes the Triple B Complex wild horse gather](#)

Downloads

Official gather documents for this gather can be accessed on ePlanning [here](#).

Information Materials:

- [Map](#)
- [Know Before You Go](#)
- [Visitation Protocol](#)
- [Triple B Gather Photos](#)

DAILY TOTALS (Feb. 23)

Animals Gathered:

0

Animals Treated with Fertility Control

0

Animals Returned to Home Range

0

Animal Deaths

2

CUMULATIVE TOTALS

Animals Gathered

1389 (531 Studs, 566 Mares, and 295 Foals)

Animals Treated with Fertility Control

28

Animals Returned to Home Range

32 mares 27 studs 3 foals

Animal Deaths: 30

Acute (#): 2

Chronic/Pre-existing (#): 28

Adoption Information

All the horses identified for removal will be transported to the Palomino Valley Wild Horses and Burro Adoption Center in Reno, Nevada where they will be checked by a veterinarian and readied for the BLM's wild horse and burro adoption program. For information on how to adopt a wild horse, visit www.blm.gov/whb.

You can also go to the [BLM's Facilities and Internet Adoption page](#)- be sure to check this one out!



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EXHIBIT C
Declaration of Rae Lovko



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/ [Nevada](#) / [2019 TRIPLE B COMPLEX WILD HORSE GATHER](#)

2019 TRIPLE B COMPLEX WILD HORSE GATHER

The Bureau of Land Management's Ely and Elko District Offices began the gather on July 8 and have concluded the wild horse and burro gather on Tuesday, July 16, 2019.

Purpose of Gather:

The purpose of the gather is to prevent undue or unnecessary degradation of the public lands associated with excess wild horses, and to restore a thriving natural ecological balance and multiple-use relationship on public lands, consistent with the provisions of Section 1333(b) of the 1971 Wild Free-Roaming Horses and Burros Act.

Removing excess animals would also enable significant progress toward achieving the Standards for Rangeland Health identified by the Northeastern Great Basin Resource Advisory Council.

Details of Gather:

The BLM will utilize the services of a helicopter contractor to gather and remove up to 800 excess wild horses. During the gather, the BLM will collect information on herd characteristics and determine herd health. The gather operation is expected to last approximately 25-30 days. Approximately 2,581 wild horses will remain in the HMA once the gather is completed. Appropriate Management Level is 474-889 wild horses.

Public Observation:

Members of the public are welcome to view the daily gather operations, provided doing so does not jeopardize the safety of the animals, staff and observers, or disrupt gather operations. The BLM will escort the public to gather observation sites located on public lands. The BLM anticipates that viewing opportunities will begin on **July 9, 2019**, weather and logistics permitting. Anyone wanting to view gather operations are to notify Public Affairs Specialist Chris Hanefeld at (775) 289-1800 prior to the desired viewing date for addition to the attendee list and to receive specific instructions on meeting locations and times.

Observers must provide their own transportation. The BLM recommends footwear and clothing suitable for harsh field conditions and a four-wheel drive, high clearance vehicle.

Adoption Information:

All horses identified for removal will be transported to the Palomino Valley Center Wild Horse and Burro Corrals in Sparks, Nev., where they will be checked by a veterinarian and readied for the BLM's wild horse and burro adoption program. For information on how to adopt a wild horse, visit www.blm.gov/whb.

Background:

The Triple B Complex is located in the BLM Elko and Ely districts on public lands administered by the Wells and Bristlecone field offices. The Complex consists of the Triple B, Maverick Medicine and Antelope Valley HMAs, and Cherry Springs Wild Horse Territory. The gather may also take place in areas outside the Complex where wild horses have moved in search of food and water and are creating a public safety hazard by traveling across roads and highways.

The current population estimate for the Triple B Complex is approximately 3,381 wild horses, excluding the 2019 foal crop. Appropriate Management Level is 474-889 wild horses. AML is the level at which wild horse populations are consistent with the land's

capacity to support them and other mandated uses of those lands, including protecting ecological processes and habitat for other resources.

Access the decision record and determination of National Environmental Policy Act adequacy at <https://eplanning.blm.gov/eplanning-ui/project/84367/510>. For more information on the Wild Horse and Burro Program, call 1-866-468-7826 or email wildhorse@blm.gov

Daily Gather Reports

Tuesday, July 17

Summary: No gather operations today. Horses were shipped today.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 137 (64 Studs, 59 Mares, 14 Foals)

Animals Released: 1 (1 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 2

Filly, Sorrel was euthanized in accordance with IM 2015-070 due to chronic injury (Severe limb deformity)

Foal, Sorrel was euthanized in accordance with IM 2015-070 due to chronic injury (weak wouldn't unable to stand for periods of time prognosis for recovery)

Monday, July 16

Summary: Gather operations continued today under mostly sunny skies, wind 0-15 mph, 58-92 F. Horses were shipped today.

Animals Gathered: 108 (36 Studs, 56 Mares, 16 Foals)

Animals Shipped: 130 (51 Studs, 54 Mares, 25 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 2

10 year old Cramello Stallion was euthanized in accordance with IM 2015-070 due to chronic condition (Blind)

19 year old Roan mare was euthanized in accordance with IM 2015-070 due to chronic condition (Blind)

Sunday, July 15

Summary: Gather operations continued today under mostly sunny skies, wind 0-15 mph, 56-88 F. Horses were shipped today.

Animals Gathered: 128 (41 Studs, 61 Mares, 26 Foals)

Animals Shipped: 81 (37 Studs, 35 Mares, 9 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 2

- **Pre-existing / Chronic:** 0

Foal, Bay was euthanized in accordance with IM 2015-070 due to acute injury (water toxicity)

Foal, Sorrel was euthanized in accordance with IM 2015-070 due to acute injury (injured during transport)

Friday, July 14

Summary: Gather operations continued today under clear sunny skies, wind 0-15 mph, 59-90 F. Horses were shipped today.

Animals Gathered: 67 (26 Studs, 32 Mares, 9 Foals)

Animals Shipped: 127 (40 Studs, 65 Mares, 22 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 3

- **Sudden / Acute:** 1

- **Pre-existing / Chronic:** 2

4 year old buckskin mare was euthanized in accordance with IM 2015-070 due to Acute condition (fractured skull)

7 year old white mare was euthanized in accordance with IM 2015-070 due to pre-existing injury (Blind)

9 year old sorrel stud was euthanized in accordance with IM 2015-070 due to pre-existing injury (Club foot)

Thursday, July 13

Summary: Gather operations continued today under clear sunny skies, wind 0-15 mph, 59-92 F. Horses were shipped today.

Animals Gathered: 173 (82 Studs, 69 Mares, 22 Foals)

Animals Shipped: 41 (13 Studs, 22 Mares, 6 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Wednesday, July 12

Summary: Gather operations continued today under clear mostly sunny skies, wind 0-15 mph, 51-91 F. Horses were shipped today.

Animals Gathered: 42 (15 Studs, 19 Mares, 8 Foals)

Animals Shipped: 83 (39 Studs, 31 Mares, 13 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 1

Foal, Bay, was euthanized in accordance with IM 2015-070 due to chronic condition (extremely weak tendons)

Tuesday, July 11

Summary: Gather operations continued today under clear sunny skies, wind 0-15 mph, 54-94 F. Horses were shipped today.

Animals Gathered: 94 (47 Studs, 34 Mares, 13 Foals)

Animals Shipped: 75 (40 Studs, 24 Mares, 11 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 2

- **Pre-existing / Chronic:** 0

6 y.o. Palomino mare was euthanized in accordance with IM 2015-070 due to acute injury (laceration)

9 y.o. Bay Mare was euthanized in accordance with IM 2015-070 due to acute injury (laceration)

Monday, July 10

Summary: Gather operations continued today under clear and mostly sunny skies, wind 0-8 mph, 54-91 F. Horses were shipped today.

Animals Gathered: 75 (40 Studs, 24 Mares, 11 Foals)

Animals Shipped: 113 (31 Studs, 56 Mares, 26 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 1

Foal, Sorrel, was euthanized in accordance with IM 2015-070 due to poor prognosis for recovery due to chronic condition, (extremely weak tendons)

Sunday, July 09

Summary: Gather operations began today under clear and mostly sunny skies, wind 0-8 mph, Low 57 degrees F., High 87 degrees F. No horses were shipped today.

Animals Gathered: 117 (32 Studs, 56 Mares, 29 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, 0 Foals)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 3

- Sudden / Acute: 2

- Pre-existing / Chronic: 1

Filly, Sorel, was humanely euthanized in accordance with IM 2015-070, due to a poor prognosis for recovery due to pre-existing condition, (missing eye)

Filly, Sorel, was humanely euthanized in accordance with IM 2015-070, due to a poor prognosis for recovery due to an acute injury, (broken right front leg)

14 year old, Sorel, Stud, was humanely euthanized in accordance with IM 2015-070, due to a poor prognosis for recovery due to an acute injury, (laceration)

News

[BLM concludes Triple B Complex wild horse gather](#)

[BLM to conduct wild horse gather in eastern Nevada](#)

Gather Status

This gather was completed on Tuesday, July 16, 2019

Animals Gathered: 804

804 (319 Stallions, 351 Mares, 134 Foals)

Animals Shipped: 787

787 (315 Stallions, 346 Mares, 126 Foals)

Animals Released: 1

1 Wild Horses (1 Stallions, 0 Mares, and 0 Foals)

Deaths: 16

-Sudden / Acute: 10

-Pre-existing / Chronic: 6

Scroll to the bottom of this gather page for detailed "Daily Gather Reports"

Downloads

[Access official planning documents on BLM's ePlanning site](#)

Informational Materials:

[programs-wildhorses-nevada-2019triple-B-map.pdf \(PDF / 1.0 MB\)](#)

[programs-wildhorses-nevada-2019triple-B-know-before-you-go.pdf \(PDF / 18 KB\)](#)

[programs-wildhorses-nevada-2019triple-B-visitation-protocol.pdf \(PDF / 22 KB\)](#)

[programs-wildhorses-nevada-2019triple-B-Q-A.pdf \(PDF / 25 KB\)](#)



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EXHIBIT D
Declaration of Rae Lovko



Home

/ Wild Horse and Burro: Herd Management: Gathers and Removals: 2020 Triple B Maverick-Medicine Emergency Wild Horse Gather

The gather has concluded - The Bureau of Land Management's Elko District, Wells Field Office wild horse emergency bait and water trap gather ran from July 28- August 18, 2020. The final load of horses was shipped to The Palomino Valley Wild Horse and Burro Center in Reno, NV on August 22, 2020.

2020 Triple B Maverick-Medicine Emergency Wild Horse Gather



Wild horses drink from Pony Springs inside the Triple B HMA.

Purpose of Gather:

The Bureau of Land Management (BLM), Ely District, Bristlecone Field Office will begin an emergency wild horse gather on or about July 24, 2020 on the Triple B and Maverick-Medicine Herd Management Areas (HMAs) located about 75 miles northwest of Ely in White Pine County, Nevada.

The action is needed due to lack of water and declining health of the wild horses - the Triple B and Maverick Medicine HMAs have a history of water issues during dry spring and summer months.

All horses identified for removal will be transported to the Palomino Valley Center Wild Horse and Burro Corrals, in Sparks, Nev., where they will be checked by a veterinarian and readied for the BLM's wild horse and burro Adoption and Sale Program.

Details of Gather:

The BLM will conduct gather operations by using temporary water and bait traps consisting of a series of corral panels stocked with water and hay; no helicopters will be used. The BLM plans to gather and remove approximately 360 excess wild horses, once gather operations are completed, approximately 1,318 wild horses will remain in the Triple B HMA and approximately 1,884 wild horses will remain in the Maverick-Medicine HMA. The gather is expected to last approximately 15-30 days.

Background:

The current population of wild horses, including the 2020 foal crop, in the Triple B HMA was estimated at 1,618 and in the Maverick-Medicine HMA was estimated at 1,944—this is approximately 448% above the appropriate management level (AML) of 250-518 and 166-276 wild horses, respectively.

The purpose of the gather is critical to prevent further deteriorating body condition of the wild horses in the area due to extremely limited water sources, undue or unnecessary degradation of the public lands associated with excess wild horses, and to restore a thriving natural ecological balance and multiple-use relationship on public lands, consistent with the provisions of Section 1333(b) of the 1971 Wild Free-Roaming Horses and Burros Act.

The **Triple B HMA** is located about 30 miles northwest of Ely, Nevada, in White Pine County. The area consists of 1,230,579 acres of BLM land and 1,915 acres of a mix of private and other public lands for a total of 1,232,494 acres. The Triple B HMA is typical of the Great Basin region, characterized by north-south trending mountain ranges. Significant features are large flat valley bottoms and steep mountains with elevations

ranging from about 6,000 feet on the valley floors to 9,000-plus feet atop the mountain peaks. The area is remote and rugged. Vegetation in the HMA consists primarily of brush, fir and mountain mahogany in the higher elevations, pinion-juniper and sagebrush on the lower mountain slopes and white sage, black sage, saltbush and other "salt desert shrub" type communities on the valley floors. The area falls within the Great Basin Desert which encompasses much of Nevada and western Utah, portions of southern Oregon and small parts of California and Idaho. The Great Basin is effectively cut off from the westerly flow of Pacific moisture due to crossing air masses created by the Sierra and Cascade mountain ranges that cool and precipitate much of the moisture out. The result is a cold, dry desert. Precipitation in the Triple B HMA ranges from approximately 7 inches on the valley bottoms to 16 to 18 inches on the mountain peaks. Most of this precipitation comes in the form of snow during the winter months. Summers are hot and dry, with high temperatures in the 90's or higher. Winters are cold, with temperatures dropping below freezing and below zero degrees.

The **Maverick-Medicine HMA** is located approximately 75 miles southeast of Elko. The area consists of 318,760 acres of BLM land and 4,802 acres of a mix of private and other public lands for a total of 323,562 acres. The HMA is 30 miles wide, 25 miles long. The highest point in the HMA is High Bald Peak at 9,396 feet in elevation. The lowest points can be found in the valley bottoms and playas and range from 6,000 to 7,000 feet. Between these high and low points, rolling juniper covered hills broken by sagebrush covered valleys make up the topography. Temperatures can be extreme, ranging from a high of 100 degrees Fahrenheit in the summer to well below 0 degrees in the winter months. The vegetation in the foothills and valley regions support desert shrubs such as sagebrush, spiny hopsage, horsebrush, shadscale and rabbitbrush mixed with many species of native grasses such as Indian ricegrass, squirreltail and bluebunch wheatgrass. The higher elevations support pinyon pine and juniper forests. At the highest elevations, fir and spruce trees are abundant.

Public Observation:

Because of the nature of the bait and water trap method, wild horses are reluctant to approach the trap site when there is too much activity; therefore, only essential gather operation personnel will be allowed at the trap site during operations.

Adoption Information:

The wild horses removed from the range will be transported to the BLM's Palomino Valley Center Wild Horse and Burro Corrals, in Sparks, Nev., where they will be checked by a veterinarian and readied for the BLM's wild horse and burro adoption program.

Animals not adopted will be cared for in off-range pastures, where they retain their "wild" status and protection under 1971 Wild Free-Roaming Horses and Burros Act.

For more information on the Wild Horse and Burro Program, call 1-866-468-7826 or email wildhorse@blm.gov.

Gather Reports

Saturday, August 22

Summary:

Animals Gathered: 0 (0 Studs, 0 Mares, and 0 Foals)

Animals Shipped: 30 (14 Studs, 16 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Friday, August 21

Summary: Widespread haze. Areas of smoke. Mostly sunny, with a high near 91. Light south wind becoming southwest 10 to 15 mph in the afternoon.

Animals Gathered: 0 (0 Studs, 0 Mares, and 0 Foals)

Animals Shipped: 43 (0 Studs, 26 Mares, and 17 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Thursday, August 20

Summary: Sunny, with a high near 91. Light and variable wind becoming southwest 5 to 10 mph in the afternoon.

Animals Gathered: 0 (0 Studs, 0 Mares, and 0 Foals)

Animals Shipped: 36 (36 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Wednesday, August 19

Summary: Sunny, with a high near 91. Light and variable wind becoming southwest 5 to 10 mph in the afternoon.

Animals Gathered: 0 (0 Studs, 0 Mares, and 0 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 4

-Sudden / Acute: 0

-Pre-existing / Chronic: 4

- 18 y.o. Grey mare BCS 1; was euthanized in accordance with IM 2015-070 due to chronic injury (blind).
- 6 y.o. Dun mare BCS 2.5; was euthanized in accordance with IM 2015-070 due to chronic injury (blind).
- 7 y.o. Sorrel stud BCS 2.5; was euthanized in accordance with IM 2015-070 due to chronic injury (blind).
- 10 y.o. Black stud BCS 2.5; was euthanized in accordance with IM 2015-070 due to chronic injury (broken leg).

Tuesday, August 18

Summary: Sunny, with a high near 90. Light southwest wind becoming west southwest 10 to 15 mph in the morning.

Animals Gathered: 63 (20 Studs, 27 Mares, and 16 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Monday, August 17

Summary: Sunny, with a high near 95. Calm wind becoming west southwest around 5 mph in the afternoon.

Animals Gathered: 20 (15 Studs, 4 Mares, and 1 Foals)

Animals Shipped: 49 (0 Studs, 25 Mares, and 24 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Sunday, August 16

Summary: Sunny, with a high near 95. Southeast wind around 5 mph becoming calm.

Animals Gathered: 33 (10 Studs, 14 Mares, and 9 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Saturday, August 15

Summary: Sunny, with a high near 95. Southeast wind around 5 mph becoming calm.

Animals Gathered: 10 (3 Studs, 4 Mares, and 3 Foals)

Animals Shipped: 40 (27 Studs, 13 Mares, and 0 Foals)

Deaths: 1

-Sudden / Acute: 0

-Pre-existing / Chronic: 1

- 15 y.o. sorrel stud BCS 2.5 was euthanized in accordance with IM 2015-070 due to chronic injury (broken leg).

Friday, August 14

Summary: Mostly sunny, with a high near 93. North northeast wind 5 to 10 mph becoming southeast in the afternoon.

Animals Gathered: 5 (2 Studs, 2 Mares, and 1 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Thursday, August 13

Summary: Sunny, with a high near 91. Light north northeast wind becoming northwest 5 to 10 mph in the afternoon.

Animals Gathered: 9 (6 Studs, 2 Mares, and 1 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Wednesday, August 12

Summary: Sunny, with a high near 84. Southwest wind 5 to 10 mph increasing to 10 to 15 mph in the afternoon.

Animals Gathered: 4 (2 Studs, 2 Mares, and 0 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Monday, August 10

Summary: Tonight: Isolated thunderstorms before 11pm. Mostly clear, with a low around 54. Northwest wind 5 to 10 mph becoming southeast in the evening. Little or no precipitation expected. Tomorrow: Sunny, with a high near 84. Southwest wind 5 to 10 mph increasing to 10 to 15 mph in the afternoon.

Animals Gathered: 21 (7 Studs, 10 Mares, and 4 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Sunday, August 9

Summary: Forecast for today isolated thunderstorms before 8pm. Mostly clear, with a low around 56. North northwest wind 5 to 10 mph becoming light and variable in the evening. Little or no precipitation expected. Isolated showers and thunderstorms after 11am. Mostly sunny, with a high near 85. Light and variable wind becoming southwest 5 to 10 mph in the morning. Chance of precipitation is 20%

Animals Gathered: 2 (0 Studs, 1 Mares, and 1 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Saturday, August 8

Summary: Forecast today Sunny, with a high near 88. South southwest wind 5 to 10 mph. Tonight Clear, with a low around 54. Tomorrow Sunny, with a high near 88. West winds 5-10 mph.

Animals Gathered: 16 (6 Studs, 6 Mares, and 4 Foals)

Animals Shipped: 95 (26 Studs, 41 Mares, and 28 Foals)

Deaths: 2

-Sudden / Acute: 0

-Pre-existing / Chronic: 2

- 6 month old Sorrel colt was euthanized in accordance with IM 2015-070 due to chronic injury (blind)
- 20+ y.o. Paint, Stud BCS 1; was euthanized in accordance with IM 2015-070 due to a hopeless prognosis of recovery.

Friday, August 7

Summary: Forecast today Sunny, with a high near 89. South southwest wind 5 to 10 mph. Tonight Clear, with a low around 54. Tomorrow Sunny, with a high near 88. West winds 5-10 mph.

Animals Gathered: 13 (3 Studs, 5 Mares, and 5 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Wednesday, August 5

Summary: Forecast today Sunny, with a high near 89. South southwest wind 5 to 10 mph. Tonight Clear, with a low around 53. South southwest winds around 5-10 mph. Tomorrow Sunny, with a high near 88. South southwest winds 5-10 mph.

Animals Gathered: 35 (9 Studs, 16 Mares, and 10 Foals)

Animals Shipped: 34 (22 Studs, 12 Mares, and 0 Foals)

Deaths: 1

-Sudden / Acute: 0

-Pre-existing / Chronic: 1

1 y.o. Black, Stud was euthanized in accordance with IM 2015-070 due to chronic injury (blind)

Tuesday, August 4

Summary: Forecast today Sunny, with a high near 94. South southwest wind 5 to 10 mph. Tonight Clear, with a low around 56. West wind around 5 mph. Tomorrow Sunny, with a high near 90. South winds 10-15 mph with gust to 25 mph.

Animals Gathered: 1 (0 Studs, 0 Mares, and 1 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Monday, August 3

Summary: Forecast today Sunny, with a high near 94. South southwest wind 5 to 10 mph. Tonight Clear, with a low around 56. West wind around 5 mph. Tomorrow Sunny, with a high near 90. South winds 10-15 mph with gust to 25 mph.

Animals Gathered: 37 (11 Studs, 16 Mares, and 10 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Sunday, August 2

Summary: Forecast today Sunny, with a high near 94. South southwest wind 5 to 10 mph. Tonight Clear, with a low around 55. West northwest wind 5-15 mph. Tomorrow Sunny, with a high near 90. West southwest around 5 mph.

Animals Gathered: 47 (10 Studs, 25 Mares, and 12 Foals)

Animals Shipped: 55 (0 Studs, 28 Mares, and 27 Foals)

Deaths: 1

-Sudden / Acute: 1

8 month old Sorrel colt was euthanized in accordance with IM 2015-070 due to acute injury (broken leg)

-Pre-existing / Chronic: 0

Saturday, August 1

Summary: Forecast today Sunny, with a high near 94. South southwest wind 5 to 10 mph. Tonight Clear, with a low around 61. South southwest wind 5 to 10 mph. Tomorrow Sunny, with a high near 90. West northwest wind 10-15 mph.

Animals Gathered: 24 (7 Studs, 9 Mares, and 8 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Friday, July 31

Summary: Forecast today Sunny, with a high near 93. Light and variable wind becoming south southwest 10 to 15 mph. Tonight Clear, with a low around 61. South southwest wind 5 to 10 mph. Tomorrow Sunny, with a high near 93. South southwest wind 5 to 10 mph.

Animals Gathered: 15 (3 Studs, 7 Mares, and 5 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Thursday, July 30

Summary: Forecast today Sunny, with a high near 93. Light and variable wind becoming south southwest 10 to 15 mph. Tonight Clear, with a low around 61. South southwest wind 5 to 10 mph. Tomorrow Sunny, with a high near 93. South southwest wind 5 to 10 mph.

Animals Gathered: 9 (3 Studs, 3 Mares, and 3 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Wednesday, July 29

Summary: Forecast today Sunny, with a high near 92. Light and variable wind becoming south southwest 10 to 15 mph. Tonight Clear, with a low around 61. South southwest wind 5 to 10 mph. Tomorrow Sunny, with a high near 94. South southwest wind 5 to 10 mph, with gusts as high as 20 mph.

Animals Gathered: 16 (8 Studs, 6 Mares, and 2 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

- details of any deaths will be noted

Tuesday, July 28

Summary: Recent rainfall has transitioned to warm and dry weather. Forecast today Sunny, with a high near 90. South wind 10-15 mph. Tonight Mostly clear, with a low around 58. West northwest wind 5 to 10 mph. Tomorrow Sunny, with a high near 91. West southwest wind 5 to 10 mph

Animals Gathered: 11 (4 Studs, 4 Mares, and 3 Foals)

Animals Shipped: 0 (0 Studs, 0 Mares, and 0 Foals)

Deaths: 0

-Sudden / Acute: 0

-Pre-existing / Chronic: 0

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News Room

News Release: [Bureau of Land Management concludes 2020 Triple B/Maverick-Medicine HMAs Emergency Wild Horse Gather](#)

News Release: [Announcement of 2020 Triple B/Maverick-Medicine HMAs Emergency Wild Horse Gather](#)

Cumulative Totals

Animals Gathered: 391

(127 Studs, 164 Mares, and 100 Foals)

Animal Deaths: 9

Pre-existing/Chronic: 8

Acute: 1

Animals Shipped: 382

(125 Studs, 161 Mares, and 96 Foals)

Scroll to the bottom of this gather page for detailed "Daily Gather Reports"

Downloads

Official gather documents can be accessed on BLM's ePlanning site: <https://go.usa.gov/xfDmZ>

Informational Materials:

- [Questions & Answers](#)



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Declaration of Rae Lovko



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2022 Triple B Complex Wild Horse Gather

The Bureau of Land Management's Elko District, Wells Field Office and Ely District, Bristlecone Field Office concluded the wild horse gather / removal and shipping on August 25, 2022. Wild horses will continue to be released for up to the next 30-days which will include treating and boosting up to 50 mares with GonaCon-Equine and releasing them back to the complex with approximately 50 stallions.

Purpose of Gather:

The purpose of the gather is to prevent undue or unnecessary degradation of the public lands associated with excess wild horses, to restore a thriving natural ecological balance and multiple-use relationship on public lands, consistent with the provisions of Section 1333(b) of the 1971 Wild Free-Roaming Horses and Burros Act. Removing excess animals would also enable significant progress toward achieving the Standards for Rangeland Health identified by the Northeastern Great Basin Resource Advisory Council.

The action is also necessary to reduce overpopulation of wild horses within and outside the Complex, where there currently is not enough water and/or forage to support the number of horses in the area, and to prevent further degradation of public lands by helping to balance herd size.

Details of Gather:

The BLM will utilize the services of a helicopter contractor to gather up to 1,900 wild horses and remove up to 1,800 excess horses. Up to 100 mares will be treated with the population suppression vaccine GonaCon and released back to the range. During the gather, the BLM will collect information on herd characteristics and determine herd health.

Public Observation:

Members of the public are welcome to view the gather operations, provided that doing so does not jeopardize the safety of the animals, staff and observers, or disrupt gather operations. The BLM anticipates that viewing opportunities will begin on or about July 15, 2022, weather and logistics permitting. Please review the "Know Before You Go" and "Visitation Protocol and Ground Rules" documents, located on the right-hand side of this page, before planning to attend.

All media and/or visitors wanting to attend gather operations as an observer must RSVP to 775-299-2645 by 5:30 p.m. the night before the intended observation date. They will receive a call back no later than 9 p.m. with the observation schedule, meeting time and location. A Public Affairs Officer and/or a Law Enforcement Officer will meet the public each morning at the pre-determined meeting location, to escort the group to and from the gather observation and/or holding sites. Observers must provide their own transportation. The BLM recommends a four-wheel drive, high clearance vehicle with spare tires and extra can of gas.

Adoption Information:

Horses identified for removal will be transported to the Indian Lakes Off-Range Wild Horse and Burro Corral, in Fallon, Nev.; and Sutherland Off-Range Corrals, in Sutherland, Utah, where they will be checked by a veterinarian and readied for the BLM's wild horse and burro adoption program. Those that are not placed into a new home will be cared for in off-range pastures, where they live off the rest of their lives on grass pastures. For information on how to adopt a wild horse, visit www.blm.gov/whb.

Background:

The Triple B Complex is located in the BLM Elko and Ely districts on public lands administered by the Wells and Bristlecone field offices. The Complex consists of the Triple B, Maverick Medicine and Antelope Valley Herd Management Areas (HMAs). The BLM Elko District, Wells Field Office administers the Antelope Valley and Maverick Medicine HMAs. The BLM Ely District, Bristlecone Field Office administers the Triple B HMA. The gather may also take place in areas outside the Complex where wild horses have moved in search of food and water and are creating a public safety hazard by traveling across roads and highways.

The current population estimate for the Triple B Complex is 3,475 wild horses, excluding the 2022 foal crop. Appropriate Management Level is 482-821 wild horses. AML is the level at which wild horse populations are consistent with the land's capacity to support them and other mandated uses of those lands, including protecting ecological processes and habitat for other resources.

Access the decision record and determination of National Environmental Policy Act adequacy at <https://eplanning.blm.gov/eplanning-ui/project/84367/510>. For more information on the Wild Horse and Burro Program, call 1-866-468-7826 or email wildhorse@blm.gov

Daily Gather Reports

Thursday, August 25

Summary: Gather operations concluded on 8/24; shipped today and released stallions. The temperatures were a high of 81 F and a low of 63 F.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 96 (47 Stallions, 38 Mares and 11 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 25 (25 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Wednesday, August 24

Summary: Gather operations conducted with a high of 89 F and a low of 63 F.

Animals Gathered: 43 (16 Stallions, 17 Mares, and 10 Foals)

Animals Shipped: 137 (24 Stallions, 66 Mares and 47 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Tuesday, August 23

Summary: Gather operations conducted with a high of 93 F and a low of 53 F.

Animals Gathered: 207 (64 Stallions, 95 Mares, and 48 Foals)

Animals Shipped: 82 (40 Stallions, 28 Mares and 14 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Monday, August 22

Summary: Gather operations conducted with a high of 89 F and a low of 51 F.

Animals Gathered: 62 (25 Stallions, 25 Mares, and 12 Foals)

Animals Shipped: 39 (24 Stallions, 15 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Sunday, August 21

Summary: Gather operations conducted with a high of 80 F and a low of 48 F.

Animals Gathered: 11 (5 Stallions, 4 Mares, and 2 Foals)

Animals Shipped: 125 (24 Stallions, 78 Mares and 23 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 1

- **Pre-existing / Chronic:** 1

3 year old Sorrel Stallion died unexpectedly: broken neck.

3 year old Brown Mare euthanized in accordance with [Permanent](#)

[Instruction Memorandum 2021-007](#): blind, missing right eye.

Saturday, August 20

Summary: Gather operations conducted with a high of 85 F and a low of 52 F.

Animals Gathered: 158 (50 Stallions, 85 Mares, and 23 Foals)

Animals Shipped: 34 (11 Stallions, 19 Mares and 4 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- Pre-existing / Chronic: 0

Friday, August 19

Summary: Gather operations conducted with a high of 79 F and a low of 49 F.

Animals Gathered: 14 (4 Stallions, 7 Mares, and 3 Foals)

Animals Shipped: 85 (23 Stallions, 39 Mares and 23 Foals)

Animals Treated with Fertility Control: (0 Mares)

- GonaCon: 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- Sudden / Acute: 0

- Pre-existing / Chronic: 0

Thursday, August 18

Summary: Gather operations conducted with a high of 88 F and a low of 55 F.

Animals Gathered: 115 (39 Stallions, 51 Mares, and 25 Foals)

Animals Shipped: 40 (12 Stallions, 20 Mares and 8 Foals)

Animals Treated with Fertility Control: (0 Mares)

- GonaCon: 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- Sudden / Acute: 1

- Pre-existing / Chronic: 0

Bay foal euthanized in accordance with [Permanent Instruction Memorandum](#)

[2021-007](#): left leg broken after being kicked by another horse.

Wednesday, August 17

Summary: Gather operations conducted with a high of 88 F and a low of 57 F.

Animals Gathered: 39 (13 Stallions, 18 Mares, and 8 Foals)

Animals Shipped: 43 (12 Stallions, 19 Mares and 12 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Tuesday, August 16

Summary: Gather operations conducted with a high of 89 F and a low of 54 F.

Animals Gathered: 59 (18 Stallions, 29 Mares, and 12 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Monday, August 15

Summary: Did not gather today.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Sunday, August 14

Summary: Did not gather today.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Saturday, August 13

Summary: Did not gather today.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 76 (29 Stallions, 34 Mares and 13 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Friday, August 12

Summary: Gather operations conducted with a high of 88 F and a low of 51 F.

Animals Gathered: 72 (25 Stallions, 34 Mares, and 13 Foals)

Animals Shipped: 82 (23 Stallions, 45 Mares and 14 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Thursday, August 11

Summary: Gather operations conducted with a high of 85 F and a low of 51 F.

Animals Gathered: 74 (24 Stallions, 36 Mares, and 14 Foals)

Animals Shipped: 84 (30 Stallions, 44 Mares and 10 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Wednesday, August 10

Summary: Gather operations conducted with a high of 78 F and a low of 51 F.

Animals Gathered: 76 (33 Stallions, 33 Mares, and 10 Foals)

Animals Shipped: 84 (26 Stallions, 48 Mares and 10 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 1

- Pre-existing / Chronic: 1

Sorrel foal died unexpectedly: colic.

5 year old Sorrel Mare euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): pre-existing broken front leg.

Tuesday, August 9

Summary: Gather operations conducted with a high of 88 F and a low of 53 F.

Animals Gathered: 100 (33 Stallions, 57 Mares, and 10 Foals)

Animals Shipped: 41 (13 Stallions, 24 Mares and 4 Foals)

Animals Treated with Fertility Control: (0 Mares)

- GonaCon: 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- Sudden / Acute: 1

- Pre-existing / Chronic: 0

7 year old Bay mare died unexpectedly: broken neck.

Monday, August 8

Summary: Gather operations conducted with a high of 86 F and a low of 52 F.

Animals Gathered: 41 (16 Stallions, 22 Mares, and 3 Foals)

Animals Shipped: 89 (41 Stallions, 34 Mares and 14 Foals)

Animals Treated with Fertility Control: (0 Mares)

- GonaCon: 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- Sudden / Acute: 0

- Pre-existing / Chronic: 1

7 year old Bay Mare euthanized in accordance with [Permanent](#)

[Instruction Memorandum 2021-007](#): blind, missing left eye.

Sunday, August 7

Summary: Gather operations conducted with a high of 84 F and a low of 52 F.

Animals Gathered: 79 (26 Stallions, 39 Mares, and 14 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Saturday, August 6

Summary: No animals were gathered or shipped. Heavy rains washed out parts of roads.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Friday, August 5

Summary: Gather operations conducted with a high of 75 F and a low of 55 F.

Animals Gathered: 12 (8 Stallions, 4 Mares, and 0 Foals)

Animals Shipped: 38 (3 Stallions, 28 Mares and 7 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Thursday, August 4

Summary: Gather operations conducted with a high of 86 F and a low of 62 F.

Animals Gathered: 39 (10 Stallions, 22 Mares, and 7 Foals)

Animals Shipped: 42 (12 Stallions, 21 Mares and 9 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 2

1 year old Sorrel filly euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): colic.

20+ year old Dun stallion euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): blind, missing right eye.

Wednesday, August 3

Summary: Gather operations conducted with a high of 90 F and a low of 60 F.

Animals Gathered: 49 (13 Stallions, 26 Mares, and 10 Foals)

Animals Shipped: 78 (17 Stallions, 45 Mares and 16 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Tuesday, August 2

Summary: Gather operations conducted with a high of 86 F and a low of 59 F.

Animals Gathered: 67 (14 Stallions, 37 Mares, and 16 Foals)

Animals Shipped: 40 (16 Stallions, 17 Mares and 7 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 1

Foal Bay filly euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): lameness -- weak tendons.

Monday, August 1

Summary: Gather operations conducted with a high of 84 F and a low of 58 F.

Animals Gathered: 28 (13 Stallions, 11 Mares, and 4 Foals)

Animals Shipped: 41 (13 Stallions, 28 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Sunday, July 31

Summary: Gather operations conducted with a high of 91 F and a low of 58 F.

Animals Gathered: 37 (11 Stallions, 22 Mares, and 4 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Saturday, July 30

Summary: No gather operations were conducted.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Friday, July 29

Summary: No gather operations were conducted.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 77 (39 Stallions, 28 Mares and 10 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 1

3 year old Bay mare euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): club foot.

Thursday, July 28

Summary: Gather operations conducted with a high of 94 F and a low of 56 F.

Animals Gathered: 76 (33 Stallions, 33 Mares, and 10 Foals)

Animals Shipped: 41 (1 Stallion, 28 Mares and 12 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 2

20+ year old Sorrel mare euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): unable to maintain or improve a BCS 3.

20+ year old Bay stallion euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): unable to maintain or improve a BCS 3.

Wednesday, July 27

Summary: Gather operations conducted with a high of 95 F and a low of 58 F.

Animals Gathered: 41 (17 Stallions, 20 Mares, and 4 Foals)

Animals Shipped: 36 (36 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 2

20+ year old Sorrel mare euthanized in accordance with [Permanent](#)

[Instruction Memorandum 2021-007](#): severe tooth loss; unable to maintain or improve a BCS 3.

3 year old Sorrel mare euthanized in accordance with [Permanent](#)

[Instruction Memorandum 2021-007](#): blind.

Tuesday, July 26

Summary: Gather operations conducted with a high of 95 F and a low of 55 F.

Animals Gathered: 52 (26 Stallions, 18 Mares, and 8 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Monday, July 25

Summary: Gather operations conducted with a high of 83 F and a low of 55 F.

Animals Gathered: 19 (8 Stallions, 9 Mares, and 2 Foals)

Animals Shipped: 73 (26 Stallions, 32 Mares and 15 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- **Sudden / Acute:** 1

- **Pre-existing / Chronic:** 1

6 year old Palomino stallion died unexpectedly: broken neck.

10 year old Sorrel mare euthanized in accordance with [Permanent](#)

[Instruction Memorandum 2021-007](#): club foot.

Sunday, July 24

Summary: Gather operations conducted with a high of 89 F and a low of 55 F.

Animals Gathered: 42 (18 Stallions, 16 Mares, and 8 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Saturday, July 23

Summary: No gather operations were conducted.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 41 (26 Stallions, 15 Mares and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- Pre-existing / Chronic: 0

Friday, July 22

Summary: Gather operations conducted with a high of 95 F and a low of 55 F.

Animals Gathered: 37 (15 Stallions, 14 Mares, and 8 Foals)

Animals Shipped: 46 (0 Stallions, 28 Mares and 18 Foals)

Animals Treated with Fertility Control: (0 Mares)

- GonaCon: 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 2

- Sudden / Acute: 0

- Pre-existing / Chronic: 2

4 month old Dun foal euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): pre-existing fractured right front leg.

4 month old Bay foal euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): pre-existing deformity -- congenital lax flexor tendons.

Thursday, July 21

Summary: Gather operations conducted with a high of 95 F and a low of 64 F.

Animals Gathered: 69 (20 Stallions, 37 Mares, and 12 Foals)

Animals Shipped: 41 (27 Stallions and 14 Mares)

Animals Treated with Fertility Control: (0 Mares)

- GonaCon: 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- Sudden / Acute: 0

- Pre-existing / Chronic: 0

Wednesday, July 20

Summary: Gather operations conducted with a high of 92 F and a low of 59 F.

Animals Gathered: 41 (12 Stallions, 24 Mares, and 5 Foals)

Animals Shipped: 38 (25 Mares and 13 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 1

- **Sudden / Acute:** 1

- **Pre-existing / Chronic:** 0

20+ year-old sorrel stallion euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): pre-existing fractured right front leg.

Tuesday, July 19

Summary: Gather operations conducted with a high of 95 F and a low of 64 F.

Animals Gathered: 56 (15 Stallions, 26 Mares, and 15 Foals)

Animals Shipped: 42 (17 Stallions, 17 Mares, and 8 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 3

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 3

20+ year-old sorrel stallion euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): pre-existing fractured right front leg.

5-year-old bay stallion euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): pre-existing, sway back

5-year-old bay mare euthanized in accordance with [Permanent Instruction Memorandum 2021-007](#): pre-existing fractured back

Monday, July 18

Summary: Gather operations conducted with a high of 95 F and a low of 56 F.

Animals Gathered: 39 (14 Stallions, 17 Mares, and 8 Foals)

Animals Shipped: 38 (11 Stallions, 20 Mares, and 7 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Sunday, July 17

Summary: Gather operations conducted with a high of 95 F and a low of 72 F.

Animals Gathered: 43 (16 Stallions, 20 Mares, and 7 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Saturday, July 16

Summary: No gather operations were conducted.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Friday, July 15

Summary: No gather operations were conducted.

Animals Gathered: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares, and 0 Foals)

Animals Treated with Fertility Control: (0 Mares)

- **GonaCon:** 0 (0 Mares)

Animals Released: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

News

[Bureau of Land Management to begin the FY2022 Triple B Complex Wild Horse Gather](#)

[Bureau of Land Management concludes the FY2022 Triple B Complex Wild Horse Gather](#)

[BLM to release Triple B Complex fertility control treated wild horses](#)

Gather Status

As of August 25

Animals Gathered: 1,897 (654 Stallions, 908 Mares, and 335 Foals)

Animals Shipped: 1,849 (623 Stallions, 897 Mares, and 329 Foals)

Animals Treated with Fertility Control: 0

0 Wild Horses (0 Stallions, 0 Mares, and 0 Foals)

GonaCon: 0 (0 Mares)

Animals Released:

25 Wild Horses (25 Stallions, 0 Mares, and 0 Foals)

Deaths: 23

-**Sudden / Acute:** 6

-**Pre-existing / Chronic:** 17

Scroll to the bottom of this gather page for detailed "Daily Gather Reports"

Downloads

[Access official planning documents on BLM's ePlanning site](#)

Informational Materials:

[Triple B Complex map \(PDF / 5.6 MB\)](#)

[Triple B Gather Observation Protocol \(PDF / 238 KB\)](#)

[Questions and Answers \(PDF / 175 KB\)](#)

[What to Know before You Go \(PDF / 95 KB\)](#)

Photos and Videos

[2022 Triple B Complex Wild Horse Gather](#)



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EXHIBIT F
Declaration of Rae Lovko



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/ [2024 Maverick-Medicine Emergency Wild Horse Gather](#)

2024 Maverick-Medicine Emergency Wild Horse Gather

The Bureau of Land Management's Elko District Office plans to begin the 2024 Maverick-Medicine Emergency Wild Horse Gather concluded on September 1 and the remaining animals were shipped on September 2.

Purpose of Gather:

The purpose of the gather is an emergency removal of excess wild horses due to limited water and declining body condition. The small springs in the area produce only limited amounts of water and cannot support the current population. In order to prevent undue or unnecessary degradation of the springs and the public lands within the HMA the Agency must reduce the number of excess wild horses.

Details of Gather:

The BLM anticipates gathering and removing up to approximately 100 wild horses via bait-trap. No helicopters will be used.

Public Observation:

Due to the nature of the bait and water trap method, wild horses or burros are reluctant to approach the trap site when there is too much activity; therefore, only essential gather operations personnel will be allowed at the trap site during gather operations.

Adoption Information:

All animals identified for removal will be transported to the Indian Lakes Off-Range Corral in Fallon, Nevada. Upon arrival to the facility, all animals will be checked by a veterinarian and readied for the BLM's Wild Horse and Burro Adoption and Sales Program.

Background:

The Maverick-Medicine HMA encompasses approximately 286,460 acres of public and private lands and has an Appropriate Management Level of 166-276 wild horses. The last inventory was in May 2023 and the current estimated population is 1,042. The most recent gather in the Maverick-Medicine HMA occurred in 2022, when 906 excess wild horses were removed.

The Maverick-Medicine HMA is located approximately 75 miles southeast of Elko. The HMA is 30 miles wide, 25 miles long. The highest point in the HMA is High Bald Peak at 9,396 feet in elevation. The lowest points can be found in the valley bottoms and playas and range from 6,000 to 7,000 feet. Between these high and low points, rolling juniper covered hills broken by sagebrush covered valleys make up the topography.

Temperatures can be extreme, ranging from a high of 100 degrees Fahrenheit in the summer to well below 0 degrees in the winter months. The vegetation in the foothills and valley regions support desert shrubs such as sagebrush, spiny hopsage, horsebrush, shadscale and rabbitbrush mixed with many species of native grasses such as Indian ricegrass, squirreltail and bluebunch wheatgrass. The higher elevations support pinyon pine and juniper forests. At the highest elevations, fir and spruce trees are abundant.

Daily Gather Reports

Monday, September 2 - The gather has concluded

Summary: n/a

Animals Gathered: 0

Animals Shipped: 25 (22 Stallions, 3 Mares, and 0 Foals)

Deaths: 0

Sunday, September 1

Summary: 47 to 88 degrees, smoke cover in the morning increasing clouds in the afternoon.

Animals Gathered: 8 (5 Stallions, 3 Mares, and 0 Foals)

Animals Shipped: 44 (26 Stallions, 36 Mares, and 19 Foals)

Deaths: 3

- **Sudden / Acute:** 1

- **Pre-existing / Chronic:** 2

12 y/o grey stud- Died: Acute, Toxicity - water

9 y/o bay mare- Euthanized: Pre-existing - extremely low body weigh with poor chance of recovery

3 y/o bay stud- Euthanized: Pre-existing - extremely low body weigh with poor chance of recovery

Saturday, August 31

Summary: 40 to 88 degrees, smoke cover in the morning increasing clouds in the afternoon.

Animals Gathered: 61 (19 Stallions, 27 Mares, and 15 Foals)

Animals Shipped: 37 (26 Stallions, 11 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Friday, August 30

Summary: 43 to 88 degrees, smoke cover in the morning clearing to sunny skies with calm breezes.

Animals Gathered:*25 (*17 Stallions, 6 Mares, and 2 Foals)

(*Corrected number)

Animals Shipped: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

Thursday, August 29

Summary: Weather was 53-81 degrees and sunny with light breezes.

Animals Gathered: 15 (9 Stallions, 4 Mares, and 2 Foals)

Animals Shipped: 0 (0 Stallions, 0 Mares, and 0 Foals)

Deaths: 0

- **Sudden / Acute:** 0

- **Pre-existing / Chronic:** 0

News

[Bureau of Land Management to begin the Maverick-Medicine Herd Management Area Emergency Horse Gather](#)

[The Bureau of Land Management has concluded the FY2024 Maverick-Medicine HMA Emergency Wild Horse bait and water gather operation](#)

Gather Status

As of September 2, 2024- The gather has concluded.

Animals Gathered: 109

109 Wild Horses (50 Stallions, 40 Mares, and 19 Foals)

Animals Shipped: 106

106 Wild Horses (48 Stallions, 39 Mares, and 19 Foals)

Deaths: 3

-Sudden / Acute: 1

-Pre-existing / Chronic: 2

Scroll to the bottom of this gather page for detailed "Daily Gather Reports"

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EXHIBIT G
Declaration of Rae Lovko

FY2025 Tentative Wild Horse and Burro Gather and Fertility Control Schedule												
as of September 9, 2024												
State	Herd Management Area (HMA) or Herd Area (HA)	Start Date	End Date	Animals Planned to be Gathered	Animals Planned to be Removed	Animals Planned to be Treated with Fertility Control	Proposed Animals Returned to Range	Gather Method	Species	Fertility Control	Gather Type	Purpose
Darting Operations												
CO	Spring Creek Basin HMA					18			Horse	PZP	Darting	
MT	Pryor Mountain HMA					80			Horse	PZP	Darting	
WY	Stewart Creek HMA					50			Horse	PZP	Darting	
WY	McCullough Peaks HMA					45			Horse	PZP	Darting	
ID	Challis HMA					15			Horse	PZP	Darting	
OR	Hog Creek HMA					15			Horse	GonaCon	Darting	
OR	Cold Springs HMA					30			Horse	GonaCon	Darting	
OR	Sand Springs HMA					60			Horse	GonaCon	Darting	
OR	Coyote Lake/Alvord-Tule Springs HMA					60			Horse	GonaCon	Darting	
CO	Sand Wash Basin HMA					150			Horse	PZP	Darting	
CO	Piceance-East Douglas HMA					100			Horse	GonaCon	Darting	
CO	Little Book Cliffs HMA					20			Horse	PZP	Darting	
NV	Pine Nut Mountains HMA					50			Horse	PZP	Darting	
UT	Onaqui Mountain HMA					80			Horse	PZP & GonaCon	Darting	
UT	Cedar Mountain HMA					20			Horse	PZP	Darting	
UT	Range Creek HMA					15			Horse	GonaCon	Darting	
Darting Operations Total				0	0	808	0					
Emergency/Nuisance Gathers (1,500)												
Un-Assigned				1467	1467							
NV	Buffalo Hills HMAs	11/15/2024	11/20/2024	33	33			Drive Trap	Burro		Nuisance	Nuisance
Emergency/Nuisance Gather Totals				1,500	1,500	0	0					
Proposed Gathers FY24 October 1, 2024 - February 29, 2025												
CA	Twin Peaks HMA (continue from FY2024)	9/30/2024	10/31/2024	943	871	30	72	Drive Trap	Horse	GonaCon	AML	Progress toward AML
CO	Sand Wash Basin HMA (continue from FY2024)	10/1/2024	2/29/2025	60	45	15	15	In-House Bait	Horse	PZP	AML	AML
OR	Kiger HMA	10/17/2024	10/30/2024	440	420	20	20	Drive Trap	Horse	GonaCon	AML	Achieve AML
NV	Triple B Complex (Triple B, Maverick-Medicine HMAs)	11/1/2024	12/21/2024	2,355	2,255	50	100	Drive Trap	Horse	GonaCon	AML	Progress Toward AML
NV	Buffalo Hills HMA	11/15/2024	11/20/2024	235	32	100	203	Drive Trap	Horse	GonaCon	CTR	AML
ID	Challis HMA	1/3/2025	4/30/2025	16	16			In-House Bait	Horse		AML	AML
NV	Fish Creek HMA	1/6/2025	1/13/2025	147	89	29	58	Drive Trap	Horse	GonaCon	CTR	AML
NV	Little Fish Lake JMA	1/14/2025	1/21/2025	270	270			Drive Trap	Horse		AML	Litigation
UT	Canyonlands HMA	2/24/2025	2/28/2025	40	40	0	0	Drive Trap	Burro		AML	Litigation
Planned Gathers Totals				4,506	4,038	244	468					
Proposed Gathers FY25 March 1, 2025 - June 30, 2025												
AZ	Three Rivers HMA	5/1/2025	5/28/2025	1100	1000	100	100	Drive Trap	Burro	GonaCon	AML	Progress Toward AML
Planned Gathers Totals				1,100	1,000	100	100					
Proposed Gathers FY25 July 1, 2025 - September 30, 2025												
ID	Saylor Creek HMA	7/1/2025	9/30/2025	92	65	13	27	In-House/Bait	Horse	GonaCon	CTR	AML
WY	Adobe Town/Salt Wells Creek HMAs	7/15/2025	9/15/2025	3,624	3,624			Drive Trap	Horse		AML	Litigation
OR	Beaty Butte HMA	8/1/2025	8/15/2025	400	400	40	40	Drive Trap	Horse	GonaCon	AML	Achieve AML
OR	Riddle Mountain HMA	8/15/2025	8/30/2025	245	225	20	20	Drive Trap	Horse	GonaCon	AML	Achieve AML
Planned Gathers Totals				4,361	4,314	73	87					
Total Including All Operations				11,467	10,852	1,225	655					

Disclaimer: this gather schedule is tentative and subject to change based on budget and holding space availability